

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.  
INITIAL REQUESTS FOR INFORMATION  
TO KENTUCKY POWER COMPANY**

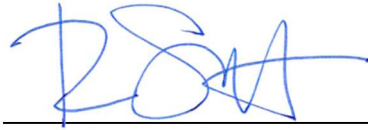
Comes now the Kentucky Solar Industries Association, Inc. (KYSEIA), by and through counsel, and in accordance with the Public Service Commission's Order dated July 14, 2020, submits its initial request for information to Kentucky Power Company (Kentucky Power).

- 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 Initial Request for Information to Kentucky Power Company.

Respectfully submitted,

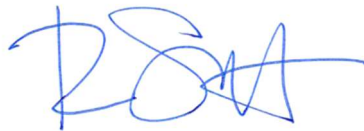


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#### **NOTICE AND CERTIFICATION FOR FILING**

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 12<sup>th</sup> day of August, 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.



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Randal A. Strobo

#### **CERTIFICATE OF SERVICE**

Undersigned counsel certifies that it has transmitted on this 12<sup>th</sup> day of August, 2020, via electronic mail messages, this Initial Request 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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Randal A. Strobo

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

1. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment03\_StegallWP1.xlsx". Please provide the "Individual Class Load Research files" referred to in cell B29 in the tab labeled "SECDEM".
2. Reference the Direct Testimony of Company Witness Alex E. Vaughan ("Vaughan Direct") at page 28, line 15 through page 29, line 2 discussing the Company's proposal to increase net metering application fees.
  - a. Please provide the Company's cost study supporting Witness Vaughan's statement that "the application fee levels are still not at full cost" at page 28, line 18.
  - b. If not included in your response to subpart a. of this request, please separately identify the Company's costs in dollars per application for processing a Level 1 and Level 2 interconnection and net metering application.
  - c. Please identify any actions the Company has undertaken or plans to undertake to reduce the cost of processing Level 1 and Level 2 interconnection and net metering applications.
3. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment17\_VaughanWP3.xlsx", the workpaper associated with Vaughan Direct Exhibit AEV-3. Please identify the source and provide all workpapers associated with the following values that are hardcoded in the tab labeled "Excess Gen Price":
  - a. Cell B7 (G Capacity – Solar Pk Reduction MW, listed at 9.55 MW)
  - b. Cell C7 (G Capacity – Price, listed at \$100)
  - c. Cell B8 (T Avoided Cost – Solar Pk Reduction MW, listed at 5.51 MW)
  - d. Cell C8 (T Avoided Cost – Price, listed at \$93,054)
  - e. Please clarify whether the T Avoided Cost includes only transmission costs or also includes sub-transmission and distribution voltage level avoided costs.
4. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment17\_VaughanWP3.xlsx", the workpaper associated with Vaughan Direct Exhibit AEV-3. Please identify the source and provide all workpapers associated with the following values that are hardcoded in the tab labeled "Typical Install Excess Percent":
  - a. Cells I21 through I24, under the column heading Summer Peak 5CP Hours wt.
  - b. Cells L14 through L16 and L20 through L26 labeled 12 CP Hours Wt.
5. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment17\_VaughanWP3.xlsx", the workpaper associated with Vaughan Direct Exhibit AEV-3, in the tab labeled "Typical Install Excess Percent". Cells F31 (1,365 kWh of monthly solar production) and E31 (1,240 kWh of total monthly usage) indicate a system sized to produce 110% of a customer's on-site needs.

- a. Does the Company permit customers to oversize a net metering system to this degree? If the Company caps or limits the size of a net metering system, identify and describe the cap or limit.
  - b. Please provide the Company's internal manual, instructions, or other guidance for how it implements the net metering tariff requirement that a qualifying system "Has the primary purpose of supplying all or part of the customer's own electricity requirements".
  - c. Should the amount of monthly production in Cell F31 be interpreted as an amount for first year production or average monthly production over the life of the system?
6. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment17\_VaughanWP3.xlsx", the workpaper associated with Vaughan Direct Exhibit AEV-3, in the tab labeled "Typical Install Excess Percent". Please explain in detail how the values in Cell J31 (51.39%) and M31 (26.72%) are used in the calculation of the proposed price for excess generation from N.M.S. II systems.
7. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment17\_VaughanWP3.xlsx", the workpaper associated with Vaughan Direct Exhibit AEV-3, in the tab labeled "Solar Profile".
  - a. Please identify the source of the hourly solar production data and all assumptions used in developing the solar production estimate, including but not limited to the modeling software used, module type, system azimuth, system tilt, inverter losses, and other energy losses.
  - b. Please identify whether the hourly solar production profile reflects prevailing time accounting for daylight savings time.
  - c. Please explain in detail why a solar profile developed based on a utility-scale production estimate is appropriate for representing a typical rooftop solar production profile.
  - d. Identify the typical rooftop solar production profile for the Kentucky Power service territory in a format equivalent to the profile used by Witness Vaughan denoting 8,760 hourly production values.
8. Reference Kentucky Power's response to Staff 3-1, entitled "KPCO\_R\_KPSC\_3\_1\_Attachment17\_VaughanWP3.xlsx", the workpaper associated with Vaughan Direct Exhibit AEV-3, in the tab labeled "Residential Profile".
  - a. Is it the Company's contention that the standard residential load profile Witness Vaughan uses is representative of a typical residential solar customer? If so please explain and provide the analysis the Company conducted in reaching this conclusion.
  - b. Did the Company perform an analysis of its existing residential solar customers when developing the Residential Profile? If so, please provide the results of this analysis, and if not please explain why it did not do so.
9. Reference Vaughan Direct at page 13, line 23 through page 14, line 2, stating "Based on test year data, the average kWh usage for the Company's low income energy assistance

customers (1,367 kWh/month) is greater than the average usage for the residential class as a whole (roughly 1,240 kWh/month).”

- a. Please provide the Company’s workpapers supporting these statements in executable spreadsheet format with all formulas and file linkages intact, and describe in detail all associated data sources and any assumptions used by Witness Vaughan.
  - b. Did the Company perform an equivalent analysis for low-income customers that did not receive energy assistance? If so, please provide the results of that analysis and all associated workpapers. If not, explain why not.
  - c. If the Company did not perform the analysis referred to in subpart b of this question, please identify and provide all of the data that would be necessary to produce such an analysis.
10. Reference Vaughan Direct at page 14, lines 5-7, stating “The Company’s electric heating customers will also benefit from the increased service charge because their average usage (1,480 kWh/month) is also above the residential class average.”
- a. Please provide the Company’s analysis supporting the 1,480 kWh/month figure for average residential electric heating customer usage.
  - b. Has the Company performed load research studies identifying how peak demand varies between electric heating customers and non-electric heating customers? If so, please provide this analysis in executable spreadsheet format with all formulas and file linkages intact.
11. Reference Vaughan Direct at page 16, lines 8-11, stating “Second, the Company incurs residential system distribution costs by sizing the distribution system to meet customer peak kW demand. These sizing costs vary by peak demand requirements, not by kWh usage or by simply connecting a customer to the system.”
- a. Does the presence of electric heating influence customer peak demand, and therefore the costs incurred by the Company to provide distribution service?
  - b. Do the Company’s distribution planning and line extension protocols with respect to equipment sizing account for the presence of electric heating and the expected amount of electric heating load (e.g., size of the heating unit or units)?
  - c. Please provide a copy of the Company manuals, instructions, or other guidance governing protocols for equipment sizing for new customer connections.
12. Reference Kentucky Power’s response to Staff 3-1, entitled “KPCO R KPSC 3 1 Attachment15\_VaughanWP1.xlsx” in the tab labeled “Cogen”.
- a. Reference Row 138, a calculation of avoided line losses. Please explain why it is appropriate to divide reported line losses (Cell I137) by two for the purpose of calculating a gross up for line loss savings included in the proposed Cogen rates (reflected in Row 147).
  - b. Would a facility under the Cogen tariff connected at Primary voltage be expected to backfeed onto the sub-transmission or transmission system and therefore incur sub-transmission and transmission line losses?



- c. Would a facility connected under the N.M.S. II tariff be expected to backfeed onto the sub-transmission or transmission system and therefore incur sub-transmission and transmission line losses?
  - d. Reference Row 146 showing time-varying Avoided Energy Costs 2020-2022 Average. Please explain in detail how these values were derived and provide the underlying data and all workpapers associated with any calculations made by the Company based on the underlying data in executable spreadsheet format with formulas and file linkages intact.
  - e. Please provide documentation supporting all of the parameters and assumptions used for the hypothetical generation unit used in the calculation of avoided capacity costs, including but not limited to the capital cost of capacity (Cell J5) and the assumptions underlying the derivation of fixed and variable O&M costs calculated in Cell J11 from inputs on Rows 117-123.
13. Reference 1: Vaughan Direct at page 24, lines 5 and 6. Kentucky Power states that “The Company’s proposed changes to the NMS tariff will only apply to customers whose eligible electric generating facility begins service after January 1, 2021.” Reference 2: Vaughan Direct Exhibit AEV-4, “TARIFF N.M.S. II (Net Metering Service II),” at page 1. Kentucky Power states, “DATE EFFECTIVE: Service Rendered On And After December 30, 2020.”
- a. Clarify the apparent discrepancy between Kentucky Power’s testimony stating that the effective date of Tariff N.M.S. II is “after January 1, 2021,” and Tariff N.M.S. II stating that it is effective “On And After December 30, 2020” and identify the specific date on which Tariff N.M.S. II will become effective.
  - b. Confirm whether the effective date of Tariff N.M.S. II refers to the date by which an eligible customer must submit a completed Net Metering application to Kentucky Power in order to be eligible for service under N.M.S. I., or describe in detail what the effective date refers to if this is not the case.
  - c. Explain under what circumstances, if any, an eligible customer-generator submitting an application to Kentucky Power for Net Metering service prior to the effective date of Tariff N.M.S. II will be permitted subsequently to amend, supplement, or correct their net metering application after the effective date of Tariff N.M.S. II without becoming ineligible for service under N.M.S. I.
14. Reference Vaughan Direct at page 29, lines 16 through 18. Kentucky Power states, “IF THE COMPANY’S AMI PROPOSAL IS APPROVED WOULD YOU PROPOSE A CHANGE TO THE NETTING PERIOD IN NMS II IN A FUTURE CASE? A. Yes.”
- a. Identify the grandfathering period, if any, that will apply to the netting period of an existing customer-generator taking service under Tariff N.M.S. II, if and when Kentucky Power implements changes to the netting period in the future.
  - b. If there will be no grandfathering period, explain why not.
15. Reference Vaughan Direct page 26, lines 12 and 13. Kentucky Power states “All excess generation will be compensated at the dollar denominated avoided cost rate of 0.03659 \$/kWh.”

- a. Identify the grandfathering period, if any, that will apply to the compensation rate for excess generation for a customer-generator taking service under Tariff N.M.S. II, if and when Kentucky Power implements changes to the compensation rate for excess generation.
  - b. If there will be no grandfathering period, explain why not.
  - c. Describe the process by which Kentucky Power intends to update the compensation rate for excess generation in the future and the anticipated frequency of changes to the compensation rate for excess generation.
16. Reference Vaughan Direct Exhibit AEV-4, "TARIFF N.M.S. II (Net Metering Service II)," page 1. Kentucky Power states that "An eligible customer-generator shall mean a retail electric customer of the Company with a generating facility that: ... (2) Has a rated capacity of not greater than forty-five (45) kilowatts."
  - a. Describe how Kentucky Power will calculate the capacity of an eligible customer-generator's system that is comprised of both a solar facility and a battery storage facility for purposes of determining whether the system is eligible for Net Metering services under Tariff N.M.S. II.
17. Reference Vaughan Direct at page 24, lines 11 through 13. Kentucky Power states, "This filing however should serve as notice to customers that the NMS tariff is changing and that a new compensation system will be in place for customers who choose to net meter in the future."
  - a. Identify any other ways in which Kentucky Power has provided or will provide notice to net metering applicants, potential customers for service under Tariff N.M.S. I, and existing customers under Tariff N.M.S. I of the date on which their service under Tariff N.M.S. I will be closed.
  - b. Identify the specific steps, requirements, and deadlines that a customer must meet in order for the customer's new, modified, or expanded generating system to be eligible for service under Tariff N.M.S. I.
  - c. Identify the notice and any documentation that will be provided to each Kentucky Power customer taking service under Tariff N.M.S. I of the start date and end date of the grandfathering period for service under Tariff N.M.S. I.
18. Reference: Vaughan Direct page 24, lines 10 and 11. Kentucky Power states that customer-generators under Tariff N.M.S. I "will be grandfathered under the previous compensation regime for up to 25 years."
  - a. Explain how Kentucky Power will calculate and apply the 25-year grandfathering period to a customer-generator taking service under Tariff N.M.S. I.
  - b. Describe how Kentucky Power will identify and track grandfathered facilities under Tariff N.M.S. I over the 25-year grandfathering period, including how Kentucky Power will ensure grandfathered systems will continue to be served under Tariff N.M.S. I if the customer-generator's premises are sold or conveyed during the applicable 25-year period.
  - c. Describe how Kentucky Power will apply the grandfathering period to an existing customer-generator taking service under Tariff N.M.S. I who subsequently adds additional eligible capacity to the existing net-metered facility prior to the

effective date of Tariff N.M.S. II, provided that the expansion of the customer-generator's existing facility does not increase the total capacity to more than 45 kilowatts.

- d. Describe how Kentucky Power will apply the grandfathering period to a customer-generator taking service under Tariff N.M.S. I who subsequently adds additional eligible capacity to the existing net-metered facility after the effective date of Tariff N.M.S. II, provided that the expansion of the customer-generator's existing facility does not increase the total capacity to more than 45 kilowatts.
  - e. Describe how Kentucky Power will apply the grandfathering period to a customer-generator taking service under Tariff N.M.S. I who subsequently adds additional capacity to the existing net-metered facility after the effective date of Tariff N.M.S. II, provided that the expansion of the customer-generator's existing facility does increase the total capacity to more than 45 kilowatts.
  - f. Describe how Kentucky Power will apply the grandfathering period to a customer-generator taking service under Tariff N.M.S. I who subsequently adds a battery energy storage system to the existing net-metered facility after the effective date of Tariff N.M.S. II.
  - g. Describe how Kentucky Power will apply the grandfathering period to a customer-generator that repairs or replaces components, such as a solar panel, of the existing net-metered facility.
19. Has Kentucky Power estimated the financial impact of net metering service on non-net metered customers? If yes, identify the cost stated to be a subsidy borne by non-net metering customers and describe how the estimate was developed.
20. Does Kentucky Power have a demand profile representative of its current net metering customers? If yes, provide the profile. If no, explain why not.
21. Has Kentucky Power considered offering community solar to satisfy customer demands and make solar power more accessible to its customers? If yes, please explain those considerations. If no, explain why not.
22. Reference Application, Filing Requirements, Exhibit F, page 23 of 41, Level 1 and Level 2 Definitions, Level 1, (1). In pertinent part, Exhibit F states: "For interconnection to a radial distribution circuit, the aggregated distribution on the circuit, including the proposed generating facility, will not exceed 15% of the Line Section's most recent annual one hour peak load."
- a. Explain how Kentucky Power determined 15% of the Line Section's most recent annual one hour peak load as an upper bound for net metered systems?
  - b. In light of other utilities allowing interconnections far in excess of 15%, please explain the limitations specific to Kentucky Power's distribution circuits.
  - c. Does the Company possess the information necessary to identify a Line Section's most recent one hour peak load that occurred during daylight hours?
23. Reference Application, Filing Requirements, Exhibit F, page 23 of 41, Level 1 and Level 2 Definitions, Level 1, (2). In pertinent part, Exhibit F states: "If the proposed generating

facility is to be interconnected on a single-phase shared secondary, the aggregate generation capacity on the shared secondary, including the proposed generating facility, will not exceed the smaller of 20 kVA or the nameplate rating of the transformer.”

Explain why Kentucky Power has set a limit of 20 kVA.

24. Reference Application, Filing Requirements, Exhibit F, page 26 of 41, Terms and Conditions for Interconnection, part (8). In pertinent part, Exhibit F states: “For Level 1 and 2 generating facilities, where required by the Company, an eligible customer shall furnish and install on customer’s side of the point of common coupling a safety disconnect switch which shall be capable of fully disconnecting the customer’s energy generating equipment from Company’s electric service under the full rated conditions of the customer’s generating facility. The external disconnect switch (EDS) shall be located adjacent to Company’s meters or the location of the EDS shall be noted by placing a sticker on the meter, and shall be of the visible break type in a metal enclosure which can be secured by a padlock.”
- a. Why is Kentucky Power requiring a safety disconnect switch adjacent to the meter?
  - b. Has the Company ever utilized such a switch on an existing system? If yes, identify the number of instances and the duration of each instance for each use by the Company of an external disconnect switch at a net-metered facility from the past five years. If the Company does not keep records of this information, explain why not.
  - c. Is the Company aware of instances of UL-listed system components failing and requiring use of such a disconnect? If yes, please identify the instances and provide details.
  - d. Are there other ways for the Company to isolate the system by removing service to the location without the additional cost of a switch being borne by the customer?
  - e. Does Kentucky Power require a similar switch for standby generators or other power supplies?
  - f. Are the locations of Level 1 and Level 2 generating facilities mapped in the Company’s internal systems in a manner that permits Company workers performing line work to utilize an EDS as needed (e.g., during power restoration work)?
  - g. Please identify the number of times during each of the last five years that a Company worker has activated an EDS for the purpose of protecting worker safety. Your response should exclude any equipment or functionality tests that took place as part of commissioning or inspection of a new facility.
25. Reference Application, Filing Requirements, Exhibit F, page 26 of 41, Terms and Conditions for Interconnection part (10). In pertinent part, Exhibit F states: “Customer shall agree that, without the prior written permission from Company, no changes shall be made to the generating facility as initially approved. Increases in generating facility capacity will require a new “Application for Interconnection and Net Metering” which will be evaluated on the same basis as any other new application. Repair and replacement of existing generating facility components with like components that meet UL 1741

certification requirements for Level 1 facilities and not resulting in increases in generating facility capacity are allowed without approval.”

- a. What constitutes an increase in generating facility capacity?
  - b. Please explain the metrics and methods the Company uses to identify what constitutes repair and replacement with “like components” from repairs or replacements that would not qualify as “like components”.
26. Reference Application, Filing Requirements, Exhibit F, page 27 of 41, Terms and Conditions for Interconnection part (12). In pertinent part, Exhibit F states: “The customer shall maintain general liability insurance coverage (through a standard homeowner's, commercial, or other policy) for both Level 1 and Level 2 generating facilities. Customer shall, upon request, provide Company with proof of such insurance at the time that application is made for net metering.”
- a. What benefit does Kentucky Power seek by requiring the customer to maintain general liability insurance coverage?
  - b. Does the Company require other customers to provide liability coverage as a condition of service? If yes, please identify all other instances.
  - c. Has Kentucky Power determined that solar generators pose an increased risk to grid infrastructure? If yes, please indicate and explain the basis for this determination. Provide all supporting data.
27. Reference Battery storage.
- a. For a customer receiving service under N.M.S. I, a grandfathered customer, does Kentucky Power interpret the addition of battery storage to the customer’s system as a change in the system requiring the approval of Kentucky Power? If yes, identify the pertinent section(s) of N.M.S. I that address the issue and explain why the approval of Kentucky Power is necessary.
  - b. If Kentucky Power interprets the addition of battery storage to an existing system that is grandfathered for service under N.M.S. I as a change in the system requiring the approval of Kentucky Power, state the effect of the change on status of the system as to continued service under N.M.S. I, including, but not limited to, Kentucky Power’s position on whether the change terminates the grandfathering period.
  - c. State separately for N.M.S. I and the proposed N.M.S. II whether Kentucky Power requires an application for a customer who is only adding an energy storage facility.
  - d. Does Kentucky Power require an application for a customer who is taking service under a tariff other than N.M.S. I or the proposed N.M.S. II for battery storage? If yes, identify the pertinent tariff provisions that require an application.
  - e. Does Kentucky Power’s net metering application for service under N.M.S. I request information about the installation or addition of storage?
  - f. Does Kentucky Power’s proposed net metering application for service under N.M.S. II request information about the installation or addition of storage?
  - g. Is Kentucky Power investigating or otherwise considering the addition of utility-controlled storage or utility-controlled solar within the remaining forecast period

of its most recent integrated resource plan? If yes, explain the nature and status of the investigation or consideration. If no, explain why not.

- h. If Kentucky Power is investigating or otherwise considering the addition of utility-controlled storage or utility-controlled solar as described in sub-part g, identify and explain the value that Kentucky Power anticipates those technologies will offer its ratepayers.
  - i. Explain how Kentucky Power will present information about net metering and the addition of storage if the Commission approves the Company's proposed N.M.S. II tariff.
28. Reference Carbon-based fuels.
- a. For a Kentucky Power customer who wants to avoid utilizing carbon-based fuels, what option(s) does Kentucky Power provide and/or propose?
  - b. For a Kentucky Power customer who seeks to be carbon neutral, is there an option through which the customer can avoid all or part of the environmental requirements compliance costs associated with carbon-based fuels otherwise collected through rates? If yes, please explain how. If no, confirm that Kentucky Power will continue to collect through rates for each customer the full amount of environmental requirements compliance costs regardless of whether the customer is utilizing carbon-based fuels.
  - c. Identify, by year for each year 2021, 2022, and 2023, Kentucky Power's anticipated or projected spending for environmental requirements compliance costs. For each year, separately provide the anticipated or projected capital project spending and the non-capital project spending for compliance.
29. Reference: Section II, Application, Filing Requirements, Exhibit F.
- a. Provide a schedule that contains the average monthly usage by month for the test year for residential service under N.M.S. I and, separately, non-residential service usage under N.M.S. I.
  - b. Provide the average monthly bill by month for the test year for residential service under N.M.S. I and, separately, non-residential service under N.M.S. I.
  - c. Under the assumption that the Commission were to approve Kentucky Power's proposed change in rates and using the average monthly usage amounts identified in sub-part a, provide the projected average monthly bill by month for residential service under N.M.S. I and, separately, non-residential service under N.M.S. I.
  - d. Under the assumptions that the Commission were to approve Kentucky Power's proposed change in rates, Kentucky Power's proposed N.M.S. II, and using the average monthly usage amounts identified in sub-part a, provide the projected average monthly bill by month for residential service under N.M.S. II and, separately, non-residential service under N.M.S. II.
30. Reference: Advanced Metering Infrastructure (AMI).
- a. Currently, upon request of a customer, will Kentucky Power share demand-interval data for the meter(s) associated with the customer's account(s)? If yes, please explain the process the customer must follow for submitting such a request

and identify any conditions or limitations, including but not limited to fees or charges for providing the information. If no, please explain why not.

- b. If Kentucky Power shares demand-interval data with a customer upon request, how does the Company provide the information (e.g., a written report, electronic report, etc.)?
- c. For a customer applying for service under N.M.S. I or the proposed N.M.S. II, will Kentucky Power provide data collected by or otherwise available through the customer's meter(s) and account(s)? If yes, please explain the process the customer must follow for requesting and obtaining the information. If no, please explain why not.
- d. For a customer applying for service under N.M.S. I or the proposed N.M.S. II, does Kentucky Power require the customer pay a fee or charge for access to data collected by or otherwise available through the customer's meter(s) or account(s)? If yes, identify the fees or charges.
- e. Under Kentucky Power's AMI proposal, upon installation, will a customer have access to the information identified in sub-parts a and d? If yes, fully explain including the identification of any conditions or limitations, including but not limited to fees or charges for the information. If no, please explain why not.
- f. For any fee or charge identified in the responses to sub-parts a through e, please reference the corresponding provision in Kentucky Power's filed tariffs.
- g. Identify all benefits of AMI for customers or potential applicants for service under N.M.S. I and the proposed N.M.S. II.