

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 July 14, 2020, 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

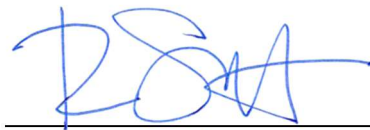
of these request between the time of the response and the time of any evidentiary hearing held by the Commission.

- 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,

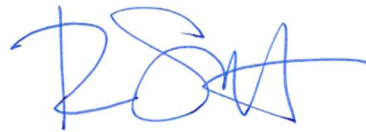


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#### NOTICE AND CERTIFICATION FOR FILING

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 16<sup>th</sup> day of September, 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 16<sup>th</sup> day of September 2020, via electronic mail messages, this Supplemental 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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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.**  
**SUPPLEMENTAL REQUESTS FOR INFORMATION**  
**TO KENTUCKY POWER COMPANY**

1. Reference Kentucky Power's response to KYSEIA 1-3(b). Please identify and explain the methods that the Company used to generate a value of \$100/MW-day as "the estimated value of PJM RPM capacity."
2. Reference Kentucky Power's response to KYSEIA 1-3 Attachment 1, in the tab labeled LSE OATT Savings.
  - a. Does the label in Columns D and E "Add Project MW" refer to the addition of the proxy 20 MW utility-scale project used to create Vaughn Direct Exhibit AEV-3? If it does not, please explain its use.
  - b. Would these LSE OATT savings be generated by qualifying facilities that take service under Tariff COGEN/SPP I or COGEN/SPP II. Please explain why or why not in detail.
3. Reference Kentucky Power's response to KYSEIA 1-15(c) stating "The Company cannot speculate on the frequency of rate changes under tariff NMS II, but it could be as often as each Kentucky Power Company base rate case or as otherwise directed by the Commission."
  - a. Does the Company anticipate updating all rate components underlying the avoided cost rate defined in tariff NMS II each time the rate changes in the future, however often that may be?
  - b. Does the Company anticipate that any updates to the avoided cost rate defined in tariff NMS II will utilize revised assumptions for aspects such as the contribution of solar to peaks, the standard residential load profile, and other assumptions used to create Vaughn Direct Exhibit AEV-3?
4. Reference Kentucky Power's response to KYSEIA 1-9 relating to information requests related to average electricity usage by customers that have received low-income assistance and Kentucky Power's response to KYSEIA 1-10 related to average electricity usage by customers with electric heating.
  - a. Please identify all assumptions that the Company used in performing the query of its billing system data for customers that received low-income assistance, including but not limited to whether it intentionally excluded any accounts. Please describe the nature of any exclusions or other modifications that the Company made to the data in detail.
  - b. Please identify all assumptions that the Company used in performing the query of its billing system data for customers that use electric heating, including but not limited to whether it intentionally excluded any accounts. Please describe the nature of any exclusions or other modifications that the Company made to the data in detail.
  - c. Please separately identify average monthly usage by customers the received low-income assistance that use electric heating, and average monthly usage by customers that received low-income assistance but do not use electric heating. For

the purposes of your response, please use the same methodology that the Company used for developing its own estimate of average monthly electricity usage by low-income assistance customers.

5. Reference the Direct Testimony of Company Witness Alex E. Vaughan (“Vaughan Direct”) at page 12, line 23 through page 13 lines 1-4 stating “This leads to a further reduction in the intra-class subsidy (over-collection of fixed costs) for the Company’s electric heating and lower income customers. As proposed, the winter heating block rate discount is worth \$14.6 million during the winter months (243,427,590 kWh times .06 \$/kWh).”
  - a. Is it the Company’s contention that low-income and electric heating customers are over-contributing to fixed cost collection at \$14.6 million annually?
  - b. Does an electric heating customer cause costs to be allocated to the residential class in a greater amount than an otherwise identical non-electric heating customer would, such as through increased allocation of production and transmission costs due to heating demand that coincides with peak demand during cold season months?
  - c. Has the Company attempted to quantify its costs to serve electric heating customers relative to its cost to serve non-electric heating customers? If so, please provide this analysis and all associated workpapers with all formulas and file linkages intact.
  - d. If your response to subpart (c) of this request is that the Company has not performed a separate cost of service analysis of electric heating customers, please explain how Witness Vaughn can contend that an “intra-class subsidy (overcollection of fixed costs)” from electric heating customers to non-electric heating customers exists?