

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)	

**SECOND SUPPLEMENTAL DATA REQUESTS OF JOINT INTERVENORS MOUNTAIN
ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH, AND KENTUCKY SOLAR
ENERGY SOCIETY TO KENTUCKY POWER COMPANY**

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Dated: March 8, 2021

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.

10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company" or "KPC" means Kentucky Power Company and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed, and affiliated companies including American Electric Power.

12. "Joint Intervenors" means the Mountain Association, Kentuckians For The Commonwealth, and Kentucky Solar Energy Society, who were granted the status of full joint intervention in this matter.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.

2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Intervenors. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement, and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.

3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SUPPLEMENTAL DATA REQUESTS PROPOUNDED TO KENTUCKY POWER COMPANY
BY JOINT INTERVENORS

JI-SDR2-#

Question JI-SDR2-1

RE: KPC response to JI-SDR-01. Please confirm that the response provided is that the Company replied upon a subjective and undocumented process in designing the proposed NMS-II tariff.

If this is not the case, please provide copies of all documents, resources, and directives that informed or prescribed the design of the proposed NMS-II tariff.

Question JI-SDR2-2

RE: KPC response to JI-SDR-02. Please confirm that the response provided is that the Company did not reference or rely upon any principles of rate making in designing the proposed NMS-II tariff.

If this is not the case, please provide copies of all documents, resources, and directives that informed or prescribed the principles that guided or informed the design of the proposed NMS-II tariff. Please explain how these principles, if any, are reflected in specific elements of the proposed NMS-II tariff, if at all. To the extent that the proposed NMS-II tariff deviated from such guiding principles, if any, please explain why this approach was chosen.

Question JI-SDR2-3

RE: KPC response to JI-SDR-03. Please confirm that the response provided is that the Company did not follow any particular process in designing the proposed NMS-II tariff.

- a. If this is not the case, please provide copies of all documents, resources, and directives that informed or prescribed the process used in the design of the proposed NMS-II tariff.

- b. Please explain how this process, if any, is reflected in the proposed NMS-II tariff, if at all. To the extent that the proposed NMS-II tariff deviated from that process, if any, please explain why a different approach was chosen.

Question JI-SDR2-4

RE: KPC response to JI-SDR-04. The Company response does not appear to address the following components of the request, styled JI-SDR-04, for which the Joint Intervenors request a specific response:

- a. Please indicate and explain in detail for each, whether the Company evaluated and quantified these impacts over the life of an installed customer generation facility in developing its proposal for a new net metering tariff.

- b. Please provide copies of any and all such evaluation and quantification.

- c. If the company did not evaluate and quantify these impacts, please explain in detail why it did not do so.

Question JI-SDR2-5

RE: KPC response to JI-SDR-05. Please confirm that the response provided is that the Company position is that the impacts of electric tariffs on customers are not relevant in rate design and may not be considered by the Commission in reaching a decision on whether to approve a tariff proposed by the Company. If this is not the Company's position, please reconcile the Company's response with the Company's position.

Question JI-SDR2-6

RE: KPC response to JI-SDR-06. Please confirm that the response provided is that the Company position is that the impacts of electric tariffs on society and the public in general are not relevant in rate design and may not be considered by the Commission in reaching a decision on whether to approve a tariff proposed by the Company.

If this is not the Company's position, please reconcile the Company's response with the Company's position.

Question JI-SDR2-7

RE: KPC response to JI-SDR-07. Please provide a supplemental response based on the testimony filed by Company witnesses Vaughan and Stegall, summarizing the response and identifying, with citation to page and line number, the responses to the request and including all subparts.

Question JI-SDR2-8

RE: KPC response to JI-SDR-08.

a. Please confirm that the Company's response is that net metering customers are viewed by the Company as wholesale generators in regard to their export or injection of excess generation.

If this is not the case, please explain.

b. Please confirm that the Company position is that net metering customers are making a sale for resale when their excess production is exported or injected.

If this is not the case, please explain.

c. Please explain in detail the Company's intended meaning for the statement that "net metering customers . . . act like a wholesale generator." Please provide metering and other data, plus copies of all analysis performed, and all resources relied upon in reaching the conclusion that net metering customers act like wholesale generators and provide details about how net metering customers do so.

d. Please provide a supplemental response based on the testimonies filed by Company witness Vaughan, summarizing the response and identifying, with citation to page and line number, the discussion in testimony of how net metering customers are wholesale generators, and when.

e. Please provide a supplemental response based on the testimonies filed by Company witness Vaughan, summarizing the response and identifying, with citation to page and line number, the discussion in testimony of how net metering customers acting like a wholesale generator impacts the Company's cost of service.

Question JI-SDR2-9

RE: KPC response to JI-SDR-09. Please confirm that the Company's response is that it has absolutely no idea what happens to net metering exports when they occur and how this impacts the distribution or transmission system. If this is not the case, please explain the Company's position in detail, and provide metering data, analysis, or other references substantiating the Company's position(s).

Question JI-SDR2-10

RE: KPC response to JI-SDR-11.

a. Please provide copies of all relevant data and charts depicting the load shapes of all net metering customers before and after installing net metered generation.

b. Please explain the Company's position on the degree of similarity between pre- and post-net metering load shapes within the population of net metering customers in its system.

Question JI-SDR2-11

RE: KPC response to JI-SDR-12. Please respond to the portion of the request that asked the Company to "explain and document" its response. If the Company offers no explanation or documentation and relied upon no explanation or documentation in developing its NMS-II tariff proposal, please so indicate. If not, please address the data request.

Question JI-SDR2-12

RE: KPC response to JI-SDR-13. Please provide a supplemental response based on the testimonies filed by Company witnesses Vaughan and Stegall, summarizing the response and identifying, with citation to page and line number, where in the testimony, and workpapers that the data and analysis for each element of the request JI-SDR-13, "a." through "n." are provided.

Question JI-SDR2-13

RE: KPC response to JI-SDR-14. (a) Please explain in detail why the Company asserts that it is not proposing that all customers receive the same compensation rate for excess generation. (b) Please explain in detail and provide cost of service data, metered data, and analysis to support the assertion that all net metering customers are "similarly situated," and that they are similarly situated with all other residential customers. If neither of these are the Company's assertions, please explain in detail the reason and meaning for the Company's response to JI-SDR-14.

Question JI-SDR2-14

RE: KPC response to JI-SDR-15. Please provide a supplemental response based on the testimonies filed by Company witnesses Vaughan and Stegall, summarizing the response and identifying, with citation to page and line number, where in the testimony and workpapers that the data and analysis and conclusions about the costs to serve net metering customers is presented, and how the costs to serve net metering customers are the same or different from the costs to serve non-generating customers.

Question JI-SDR2-15

RE: KPC response to JI-SDR-16. Please reconfirm the Company's commitment to provide a response to the request as submitted.

Question JI-SDR2-16

RE: KPC response to JI-SDR-17. Please provide a response to request, which sought an explanation for the Company's position.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the electronic version of the foregoing is a true and accurate copy of the same document that will be filed in paper medium; that the electronic filing has been transmitted to the Commission on March 8, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the March 16, 2020 Commission Order in Case No. 2020-00085 an original and ten copies in paper medium of this *Statement Regarding Receipt of Electronic Transmissions* will not be mailed until after the lifting of the current state of emergency.



Tom FitzGerald