

**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 Practices To Establish)	Case No. 2020-00174
Regulatory Assets And Liabilities; (4) Approval Of A)	
Certificate Of Public Convenience And Necessity;)	
And (5) All Other Required Approvals And Relief)	

Kentucky Power Company’s Supplemental Data Requests to Joint Intervenors

Pursuant to the Commission’s Order dated January 15, 2021, Kentucky Power Company propounds the following data requests to be answered by Mountain Association for Community Economic Development (“MACED”), Kentuckians for the Commonwealth (“KFTC”), and the Kentucky Solar Energy Society (“KYES”) (collectively “Joint Intervenors”):

DEFINITIONS

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
- “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.
- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
- 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.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Attorney General's possession or subject to its control, state what disposition was made of it.
- 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.
- "Identify" used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
- 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.
- "You" or "your" means the person whose filed testimony is the subject of these interrogatories 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 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.
- "Joint Intervenors" means Mountain Association for Community Economic Development, Kentuckians for the Commonwealth, and/or the Kentucky Solar Energy Society, their employees, and/or their agents, including Andrew McDonald, James Owen, Joshua Bills, and Karl R. Rabago.
- "PJM" means PJM Interconnection.
- "Company" means Kentucky Power Company.
- "AEP" means American Electric Power Company, Inc.

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 interrogatories are continuing in nature, and, without regard to the date created or obtained, 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 Kentucky Power. Any studies, evaluations, analyses, 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 interrogatory 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.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

DATA REQUESTS

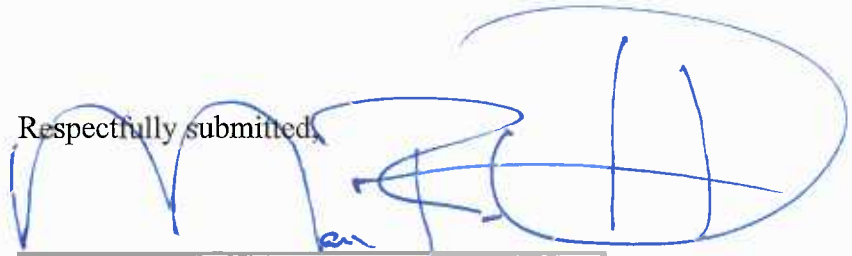
1. Provide all schedules, tables, and charts included in the testimony and exhibits to the supplemental testimony of Joshua Bills in electronic format, with formulas intact and visible, and no pasted values.
2. Provide all workpapers, source documents, and electronic spreadsheets used in the development of the supplemental testimony of Mr. Bills. The requested information, if so

available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

3. Provide all schedules, tables, and charts included in the testimony and exhibits to the supplemental testimony of Karl Rabago in electronic format, with formulas intact and visible, and no pasted values.
4. Provide all workpapers, source documents, and electronic spreadsheets used in the development of the supplemental testimony of Mr. Rabago. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Confirm that the Company's net metering cost of service study supports the rates proposed in the NMS II tariff. If your answer is anything other than an unqualified confirmation, state in detail the basis for the same and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.
6. Confirm that neither Mr. Rabago nor Mr. Bills has performed a full class cost of service study for Kentucky Power that includes separate classes for net metering customers. If your answer is anything other than an unqualified confirmation provide the study in an electronic format, with formulas intact and visible, and no pasted values.
7. Refer to page 4, lines 11-18 of the Bills Supplemental Testimony: (a) Explain the basis, including all supporting facts, for Mr. Bills' assertion that "host customer" benefits should be considered in the Company's rates for electric service; and (b) Identify the specific statutory basis, including all citations to the Kentucky Revised Statutes, for the assertion.
8. Refer to pages 5-6 of Mr. Bills' Supplemental Testimony: With respect to the non-profit community foundation referenced by Mr. Bills please provide the following information:
 - (a) the name of the non-profit community foundation;
 - (b) the service address of the non-profit community foundation; and
 - (c) the application number or other unique identifier assigned to the referenced application.
9. Identify by name and address the five "enterprises" discussed at pages 6-7 of Mr. Bills' Supplemental Testimony.
10. Confirm that the Company's net metering full cost of service study evidences that net metering customers are subsidized by all other customers, including non-net metering residential customers. If your answer is anything other than an unqualified confirmation, state in detail the basis for the same and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.

11. State whether Mr. Rabago has ever produced a class cost of service study in an electric utility rate case. For purposes of this question, a class cost of service study means one that is/was based upon tariff rates and the utility's incurred costs. If he has, provide the stud(ies) in Excel format with formulas intact and visible, and no pasted values.
12. Refer to page 8, lines 4-6 of the Rabago Supplemental Testimony: Identify all record evidence relied upon in making assertions that the Company's proposed NMS II tariff is "economically inefficient and...discriminatory" and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.
13. Refer to page 9, lines 6-11 of the Rabago Supplemental Testimony: Identify where in the Net Metering Act support can be found for Mr. Rabago's assertions that "the rate making process must examine the quantifiable benefits and costs of net-metered systems in light of the utility's unique characteristics and the specific cost of serving the utility's customers," and "[t]he Commission has the broad authority to consider all relevant factors in the context of a rate proceeding such as this one regarding evidence of the quantifiable benefits and costs of a net-metered system."
14. Refer generally to pages 9 through 25 of Mr. Rabago's Supplemental Testimony:
 - (a) Confirm that adding industrial load also provides benefits outside Kentucky Power's cost of service.
 - (i) If the answer to subpart (a) is anything other than an unqualified confirmation please provide in detail the facts supporting the failure to confirm the statement unequivocally.
 - (b) If Mr. Rabago confirms that adding industrial load also provides benefits outside Kentucky Power's cost of service please explain whether a benefit-cost analysis is required to establish industrial rates;
 - (c) Please state whether Kentucky Power's rates for service to its industrial customers (Tariff I.G.S. and Tariff L.G.S.) reflect any non-cost of service benefits provided by Kentucky Power's industrial customers.

Respectfully submitted,



Mark R. Overstreet
Katie M. Glass
STITES & HARBISON PLLC
421 West Main Street
P. O. Box 634
Frankfort, Kentucky 40602-0634
Telephone: (502) 223-3477
Facsimile: (502) 779-8349
moverstreet@stites.com
kglass@stites.com

Christen M. Blend (*pro hac vice*)
Hector Garcia-Santana (*pro hac vice*)
Tanner S. Wolffram (*pro hac vice*)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614) 716-1915
Facsimile: (614) 716-2950
cblend@aep.com
hgarcia@aep.com
tswolffram@aep.com

COUNSEL FOR KENTUCKY POWER
COMPANY