

**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 KYSEIA

Pursuant to the Commission’s Order dated January 15, 2021, Kentucky Power Company propounds the following data requests to be answered by Kentucky Solar Industries Association, Inc. (“KYSEIA”):

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 or 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.
- "KYSEIA" means Kentucky Solar Industries Association, Inc., its employees, and/or its agents, including Justin R. Barnes, James M. Van Nostrand, Benjamin D. Inskeep, and Richard McCann.
- "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 Benjamin Inskeep 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 testimony of Mr. Inskeep. 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 Richard McCann 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 Dr. McCann. 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. Inskeep nor Dr. McCann 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. Confirm that the Company's net metering 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.
8. Refer to page 5, lines 6-12 of the Inskeep Supplemental Testimony: Identify all record evidence relied upon in making assertions that new installations would decline to "near zero in the future if Tarif NMS II is adopted" and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.
9. Refer to page 9, lines 3-11 of the Inskeep Supplemental Testimony: Confirm that the Company's cost of service study now submitted provides "evidence on the costs necessary to serve its net metering customers in Kentucky." 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.
10. Refer to page 11, lines 1-7 of the Inskeep Supplemental Testimony:
 - (a) Confirm that the Company's proposed Tariff NMS II compensates customers for avoided energy, distribution losses, ancillary services, generation capacity, and RTO transmission costs;

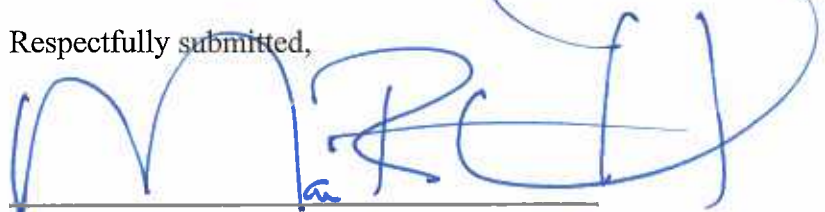
(i) If the answer to subpart (a) is anything other than an unqualified confirmation please provide in detail the facts supporting the failure to confirm the statement unequivocally.

(b) Identify all record evidence relied upon to support Mr. Inskeep's assertion that the Company "consider[s] costs while ignoring the benefits provided by net metering systems when determining a compensation rate..." including, without limitation, each individual benefit ignored and its corresponding monetary value.

11. Refer to page 19, lines 1-5 of the Inskeep Supplemental Testimony: Identify the specific record evidence relied upon to make the allegation that "policymakers have determined that maintaining the overall structure of net metering continues to be in the interest of customers."
12. Refer to page 21, lines 4-7 of the Inskeep Supplemental Testimony. Identify all record evidence supporting your assertion that each of the bullet-point statements (on pages 21-23) represent the "best practices...for policymakers to consider when evaluating modifications to net metering policies" and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.
13. Refer to page 25, lines 17-20 of the Inskeep Supplemental Testimony: Identify all record evidence relied upon in making assertions that "failure to provide clear and sufficient Legacy Rights to new net metering customers...in this proceeding would immediately chill the market for new net metering systems" and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.
14. Refer to page 26, lines 5-7 of the Inskeep Supplemental Testimony: Identify all record evidence relied upon in making assertions that "[i]t is highly unlikely that a customer would undertake a 30-year investment that could benefit the grid by providing excess solar generation if the customer only has two years of certainty with respect to the export credit rate" and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values.
15. Provide all source material relied upon to generate Table 2 in the Inskeep Supplemental Testimony.
16. Refer to page 5, lines 15-19 and page 5, lines 1-3 of the McCann Supplemental Testimony: (a) Identify all record evidence relied upon to support the bullet-point "principles" that KYSEIA asserts should be used by the Commission in setting net metering rates. (b) Identify where in the Net Metering Act those bullet-point "principles" can be found.
17. Refer to page 6, lines 10-12 of the McCann Supplemental Testimony: (a) Provide all record evidence supporting Dr. McCann's assertion that net metering customers' investment(s) will "benefit all ratepayers over the long term" and provide all supporting analyses in an electronic format, with formulas intact and visible, and no pasted values; and (b) Identify where in the Net Metering Act support can be found for Dr. McCann's assertion that "[i]nvestments made by ratepayers that will benefit all ratepayers over the

long term should be offered tariffs, as with contracts, that provide a reasonable assurance to recover those investments.”

Respectfully submitted,



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