

Kentucky Power Company  
KPSC Case No. 2020-00174  
SWVA Initial Set of Data Requests  
Dated August 13, 2020

**DATA REQUEST**

**SWVA\_1\_01** Please provide copies of all discovery/data requests issued to Respondents in this proceeding.

**RESPONSE**

Objection. Kentucky Power on May 29, 2020 filed its notice of election to use electronic filing procedures. SWVA was granted intervention by Order dated August 13, 2020. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission." SWVA thus is required by the Commission's regulations to view or download the requested information from the Commission's website. To the extent the requested information was filed prior to August 13, 2020, the requested information is available at <http://psc.ky.gov> and is equally accessible to SWVA.

Prepared by Counsel

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**DATA REQUEST**

**SWVA\_1\_02** Please provide copies of all discovery/data requests issued by Respondents in this proceeding.

**RESPONSE**

Objection. Kentucky Power on May 29, 2020 filed its notice of election to use electronic filing procedures. SWVA was granted intervention by Order dated August 13, 2020. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission." SWVA thus is required by the Commission's regulations to view or download the requested information from the Commission's website.

Prepared by Counsel

Kentucky Power Company  
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**DATA REQUEST**

**SWVA\_1\_03** Please provide all answers submitted by Respondents in response to discovery/data requests of all parties in this proceeding.

**RESPONSE**

Objection. Kentucky Power on May 29, 2020 filed its notice of election to use electronic filing procedures. SWVA was granted intervention by Order dated August 13, 2020. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission." SWVA thus is required by the Commission's regulations to view or download the requested information from the Commission's website. To the extent the requested information was filed prior to August 13, 2020, the requested information is available at <http://psc.ky.gov> and is equally accessible to SWVA.

Prepared by Counsel

Kentucky Power Company  
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**DATA REQUEST**

**SWVA\_1\_04** Please provide all answers submitted to Respondents in response to discovery/data requests of Respondents in this proceeding.

**RESPONSE**

Objection. Kentucky Power on May 29, 2020 filed its notice of election to use electronic filing procedures. SWVA was granted intervention by Order dated August 13, 2020. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission." SWVA thus is required by the Commission's regulations to view or download the requested information from the Commission's website.

Prepared by Counsel

Kentucky Power Company  
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**DATA REQUEST**

**SWVA\_1\_05** Under the proposed Tariff C.S.-I.R.P., the Company proposes to change the required contracted interruptible capacity from "capacity sufficient to meet normal maximum interruptible power requirements" to "capacity sufficient to meet average maximum interruptible power requirements" (emphasis added). Explain in detail why the Company is proposing to make this change. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The Company made the proposed change from "normal" to "average" in its Tariffs because average (such as a 12 month average) is more easily defined than the term normal. No supporting documents or workpapers exist.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_06** Under the proposed Tariff C.S.-I.R.P., the Company proposes to change the required contracted interruptible capacity from "capacity sufficient to meet normal maximum interruptible power requirements" to "capacity sufficient to meet average maximum interruptible power requirements" (emphasis added). Explain in detail how the Company expects the change from "normal" to "average" will impact the Tariff C.S.-I.R.P. customer's (i) interruptible credit, and (ii) electricity bills/cost. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The Company expects no impact on Tariff CS-IRP customers. Please see also the Company's response to SWVA 1-5.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_07** Under the proposed Tariff C.S.-I.R.P., the Company proposes to change the required contracted interruptible capacity from "capacity sufficient to meet normal maximum interruptible power requirements" to "capacity sufficient to meet average maximum interruptible power requirements" (emphasis added). Explain in detail how the Company expects the change from "normal" to "average" will impact the Tariff C.S.-I.R.P. customer's (i) interruptible obligation, and (ii) operations/interruption(s) to comply with the new language. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

Please refer to the Company's response to SWVA 1-6.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_08** Under the proposed Tariff C.S.-I.R.P., the Company adds tariff language stating that it "reserves the right to test and verify the customer's ability to curtail." Please explain the Company's process for initiating a test under the proposed tariff. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The referenced tariff language was previously captured in the CS-IRP Customers' addendums for service under CS-IRP and is a PJM requirement. The Company added this language to the CS-IRP tariff sheets to increase transparency and ensure that the tariff language and customer addendums are consistent.

Witness: Alex E. Vaughan



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**DATA REQUEST**

**SWVA\_1\_09** The Company proposes a new interruptible service option. Rider D.R.S, which includes establishing an Interruptible Demand Credit Rate of \$5.50/KW-month. Please explain in detail the basis for, and calculations arriving at, the proposed credit rate. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

Please refer to Section VI of Company Witness Vaughan's Direct Testimony beginning on page 34 for the requested explanation. Please also refer to the Company's response to KPSC 4-95 for a corrected version of Exhibit AEV-7, DRS cost benefit analysis. The exhibit was corrected for a small error described in the Company's response to KPSC 4-95, which does not affect the proposed \$5.50/kW-month DRS interruptible demand credit.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_10** The Company proposes not to change the interruptible credit under Tariff C.S.-I.R.P. Please explain in detail the basis for this decision and provide details as to how the credit is calculated. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The interruptible demand credit in Tariff CS-IRP is the result of a settlement in a previous case (Mitchel Plant transfer case), no workpapers exist for its derivation. The Company did not propose to change the CS-IRP demand credit because it is still similar to what would be realized if a customer were able to participate directly in PJM's demand response as a capacity resource construct and receive compensation at RPM clearing prices.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_11** Tariff C.S.-I.R.P. and Rider D.R.S. are both interruptible service options, yet the proposed credits differ. Please explain in detail what accounts for the difference and why the interruptible credit under C.S.-I.R.P. is lower than that proposed for Rider D.R.S. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

Please refer to Section VI of Company Witness Vaughan's Direct Testimony beginning on page 34, where this is explained. Additionally, to be clear, CS-IRP is a capacity resource, proposed Tariff DRS is a load reducer. The two different products have different values and different participation requirements such as the 60 annual hours of interruption under proposed Tariff DRS.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_12** Please explain how the Company calculated the discount/credits under (a) Tariff C.S.-I.R.P. and (b) Rider D.R.S. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

Please refer to the Company's responses to SWVA 1-9 and 1-10.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_13** Please explain in detail whether a portion of a customer's interruptible load could be served under Tariff C.S.-I.R.P. and a portion under Rider D.R.S. Explain whether and how the answer varies depending on the Company's metering of the load. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

No. This is explained in Company Witness Vaughan's Direct Testimony at page 37, line 26 through page 38, line 6.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_14** Please explain how the proposed penalty for failure to curtail under Tariff C.S.- I.R.P. was calculated. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The non-compliance penalty is included in the customer addendums for service under CS-IRP and is based upon PJM's rules and requirements concerning demand response as a capacity resource, as well as any actual penalties the Company would receive from PJM for a CS-IRP customer's non-performance during a test or an actual performance event.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_15** Please explain how the proposed penalty for failure to curtail under Rider D.R.S. was calculated. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

Please refer to Company Witness Vaughan's Direct Testimony at page 36. The charge for failure to curtail under Rider D.R.S. is not as much a penalty as it is a repayment of the annual interruptible discount the customer is receiving for participation under proposed Tariff DRS.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_16** Please explain the basis for distinct penalties for failure to curtail under Tariff C.S.- I.R.P. and Rider D.R.S. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The two different offerings are just that, two different demand response products. Under Tariff CS-IRP, the Company could actually receive penalties from PJM for a customer's non-performance. Under proposed Tariff DRS, the Company would not receive penalties from PJM but rather would fail to achieve peak shaving cost of service benefits from a customer's non-performance.

Witness: Alex E. Vaughan



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**DATA REQUEST**

**SWVA\_1\_17** Under Section II—Application, Filing Requirements, Exhibit I, Average Customer Bill Impacts, the Company shows an average increase for the I.G.S tariff class of 7.6%. However, Section II—Application, Filing Requirements, Exhibit J, Page 33, shows an increase of 12.5% to I.G.S. Transmission voltage customers. Please explain why the increase to I.G.S. Transmission customers is higher than that to the I.G.S class as a whole. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The increase to IGS Transmission class is not 12.5%. Exhibit J is an example typical bill analysis at one utilization level for IGS Transmission; actual customer results will vary. Please refer to Section II, Exhibit J pages 1 and 2 for the increase information for the IGS class at its various voltage levels by comparing the Total Proposed Revenue column to the Total TY Per Books Revenue column.

Witness: Alex E. Vaughan

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**DATA REQUEST**

**SWVA\_1\_18** Please explain why the percentage increase to Tariff I.G.S. reflected in Company witness Stegall's table, "Base Rate Increase" (Exhibit JMS-2), is higher than the percentage increase listed in Section II—Application, Filing Requirements, Exhibit I, Average Customer Bill Impacts. Include all relevant documentation and supporting workpapers with formulas intact.

**RESPONSE**

The Base Rate Increase reflected in Exhibit JMS-2 only addressed the change in base rate revenues for Tariff I.G.S as a whole. Exhibit I reflects an impact on an average total bill. Exhibit J, pages 1-2 and 23 - 26 provide the detail necessary to identify all changes to customer rates. Company Exhibits I and J were filed electronically as KPCO\_R\_KPSC\_2\_16\_Attachment2.

Witness: Jason M. Stegall



### KY Discovery Verification - Stegall.docx

DocVerify ID: AA56209F-7221-4A9F-9824-F538DF67E0FF  
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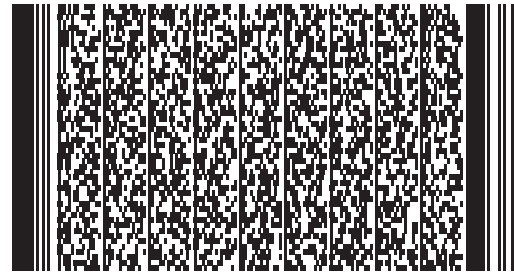
**E-Signature 1: Jason M. Stegall (JMS)**

August 21, 2020 08:08:44 -8:00 [CB6EA5D4359F] [161.235.221.80]  
jmstegall@aep.com (Principal) (Personally Known)

**E-Signature Notary: Sarah Smithhisler (SRS)**

August 21, 2020 08:08:44 -8:00 [6A784B1242DD] [167.239.221.85]  
srsmithhisler@aep.com

I, Sarah Smithhisler, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Jason M. Stegall, being duly sworn, deposes and says he is a Manager-Regulatory Pricing & Analysis for American Electric Power Service Corporation that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

  
Signed on 2020/08/21 08:08:44 -8:00

Jason M. Stegall

STATE OF OHIO


)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Jason M. Stegall this 21<sup>st</sup> day of August 2020.

  
Signed on 2020/08/21 08:08:44 -8:00

Notary Public



Notary ID Number: 2019-RE-775042

My Commission Expires: April 29, 2024

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#### E-Signature Summary

**E-Signature 1: Alex E Vaughan (AEV)**

August 24, 2020 08:19:44 -8:00 [B694FB97B8BA] [167.239.221.80]  
aevaughan@aep.com (Principal) (Personally Known)

**E-Signature Notary: Sarah Smithhisler (SRS)**

August 24, 2020 08:19:44 -8:00 [534F5390061F] [167.239.2.87]  
srsmithhisler@aep.com

I, Sarah Smithhisler, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is a Director-Regulatory Pricing & Renewables for American Electric Power Service Corporation that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.

*Alex E Vaughan*  
Signed on 2020/08/24 08:19:44 -8:00

Alex E. Vaughan

STATE OF OHIO

)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Alex E. Vaughan this 24<sup>th</sup> day of August 2020.

*S. Smithhisler*  
Signed on 2020/08/24 08:19:44 -8:00

Notary Public

Notary ID Number: 2019-RE-775042

My Commission Expires: April 29, 2024



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