

**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 Data Requests to Kentucky Solar Industries Association

Pursuant to the Commission’s Order dated July 14, 2020, Kentucky Power Company propounds the following data requests to be answered by Kentucky Solar Industries Association (“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 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.
- "KYSEIA" means Kentucky Solar Industries Association, its employees, and/or its agents, including Justin R. Barnes, Benjamin D. Inskeep, and James M. Van Nostrand.
- "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. Please provide any and all electric utility cost of service studies, electric utility retail customer load research studies, and rate design calculations performed by KYSEIA witnesses Barnes or Van Nostrand.
2. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Justin R. Barnes in electronic format, with formulas intact and visible, and no pasted values.

3. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Barnes. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
4. Please refer to the testimony of Mr. Barnes at page 6. Mr. Barnes states that, “the most fundamental question is whether a subsidy exists in the first place.”
 - (a) Explain whether Mr. Barnes has conducted any calculations or studies related to whether or not Kentucky Power Company’s existing net metering customers are paying the full costs for their electric utility service.
 - (b) If the answer to (a) is affirmative, please provide a copy of the calculations and/or studies and all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
5. Explain whether Mr. Barnes conducted any study, calculation, or analysis related to the reasonableness of the Company’s proposed N.M.S. II avoided rate of \$.03659/kWh. If he has, please provide a copy of the bill impact analysis and all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
6. Refer to the testimony of Justin R. Barnes, page 17. Mr. Barnes states that his estimate shows that the Company’s N.M.S. II tariff would reduce customer bill savings by 30-40% for a system sized to produce an approximate 100% load offset on an annual basis. Please provide the workpapers, source documents, and electronic spreadsheets used in the development of this estimate.
7. Please confirm that the customers served under the Company’s current N.M.S. tariff are being provided with greater intra-class subsidies as compared to customers who would take service under the Company’s proposed N.M.S. II tariff.
8. Please confirm that you do not object to the Company closing its current N.M.S. tariff to new customers on December 30, 2020. If your response is anything other than an unqualified confirmation please identify where in your testimony the objection is made and provide basis for the objection, including all evidence supporting the objection.
9. Refer to the testimony of Justin R. Barnes, pages 22 through 23. Mr. Barnes claims that a “customer could install battery storage and effectively shift the production profile of solar system so as to store electricity that would otherwise be exported during one period and use it during the other netting period.”

- (a) Please explain whether Mr. Barnes is aware of any N.M.S. customer in the Company's service territory that has installed a battery storage system.
 - (b) Please provide the average cost of installing such a battery storage system.
 - (c) Please provide all evidence and calculations supporting your response to subpart (b) of this data request. All calculations should be presented in in electronic format, with formulas intact and visible, and no pasted values.
10. Refer to the testimony of Justin R. Barnes, pages 31 through 32. Mr. Barnes disagrees with the Company's calculation of the generation capacity and transmission capacity rates but offers no rate design recommendations related to the calculation of generation capacity and transmission capacity rates.
- (a) Confirm that KYSEIA and Mr. Barnes are not making any recommendations with respect to these aspects of rate design.
 - (b) If your response is anything other than an unqualified confirmation please where in your testimony the recommendation is made and provide basis for the recommendation, including all evidence supporting the objection.
11. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Benjamin D. Inskeep in electronic format, with formulas intact and visible, and no pasted values.
12. Please 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.
13. Refer to the testimony of Benjamin D. Inskeep, page 6. Mr. Inskeep states "there have been numerous studies in recent years that have examined the costs and benefits of net metering or the value of solar DG." Please provide copies of all referenced studies reviewed or relied upon by Mr. Inskeep to support this claim.
14. Refer to the Direct Testimony of Benjamin D. Inskeep, Figure 3 on page 9. Please confirm that Mr. Inskeep did not conduct, participate in, and/or author the "value of solar studies" included in Figure 3. If your response to the foregoing request is anything other than an unqualified confirmation, please explain Mr. Inskeep's participation with regard to the referenced studies.
15. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of James M. Van Nostrand in electronic format, with formulas intact and visible, and no pasted values.
16. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Van Nostrand. The requested information, if so

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

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) 223-4124
moverstreet@stites.com
kglass@stites.com

Christen M. Blend (*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

COUNSEL FOR KENTUCKY POWER
COMPANY