

**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 Joint Intervenors, Mountain Association,
Kentuckians for the Commonwealth, and Kentucky Solar Energy Society**

Pursuant to the Commission’s Order dated July 14, 2020, Kentucky Power Company propounds the following data requests to be answered by Joint Intervenors, Mountain Association, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society (“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 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.
- "Joint Intervenors" means Mountain Association, Kentuckians for the Commonwealth, and/or Kentucky Solar Energy Society, their employees, and/or their agents, including Joshua Bills, Andrew McDonald, and James Owen.
- "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 all schedules, tables, and charts included in the testimony and exhibits to the testimony of Joshua Bills in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the 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. 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. If your response is anything other than an unqualified confirmation please provide all evidence supporting the response, including but not limited to, all calculations supporting the response. All such calculations should be provided in an electronic format, with formulas intact and visible, and no pasted values.
4. Please provide all facts, including all relevant documents, that support Mr. Bills claim that, as of September 16, 2020, there is 87.32 kW (AC) of installed N.M.S. capacity for Large General Service in the Company's service territory.
5. Refer to the testimony of Joshua Bills, page 5, lines 2 through 5. Mr. Bills claims that the Company's calculation of avoided-cost rate for N.M.S. II, "does not address the impacts of G.S. and L.G.S. participants paying demand charges from which fixed costs are generally recovered" but offers no rate design recommendations addressing those alleged impacts.
 - (a) Please confirm that the Joint Intervenors are not making any recommendations with respect to this aspect of the avoided-cost rate design.
 - (b) If your response is anything other than an unqualified confirmation please provide all evidence supporting the response, including but not limited to, all calculations supporting the response. All such calculations should be provided in an electronic format, with formulas intact and visible, and no pasted values.
6. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Andrew McDonald. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
7. Refer to the testimony of Mr. McDonald on page 6, starting on line 1, which states: "For multiple years KPC worked alongside other investor owned utilities, East Kentucky Power Cooperative, and industry lobbyists to lobby the legislature to change the Kentucky's net metering statute, on the premise that net metering was causing an unfair cost-shift between ratepayers and presumably causing a measureable, non-negligible financial impacts to the general ratepayer." Please provide all facts, including all relevant documents, which support this statement.
8. Refer to the testimony of Mr. McDonald at page 7 and Attachment 1.
 - a. Confirm that Mr. McDonald did not author Attachment 1.

- b. If your response to subpart (a) is anything other than an unqualified confirmation, please explain Mr. McDonald's involvement in the preparation of Attachment 1.
 - c. Confirm that Karl Rabago has not filed direct testimony in this proceeding and will not be offered by Joint Intervenors as a witness at the hearing of this case.
 - e. Confirm that Mr. McDonald's testimony offers Attachment 1 for the truth of the matter asserted in Attachment 1.
9. Refer to Table 1- Potential Financial Impacts of Net Metering on KPC's Residential Ratepayers for Current Test Year (April 2019 to March 2020), *Assuming Distributed Solar Has No Value Beyond KPC's Avoided Cost Rate* on page 8 of Mr. McDonald's testimony. Please provide the study and all workpapers supporting that table in Microsoft Excel working format.
10. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of James Owen in electronic format, with formulas intact and visible, and no pasted values.
11. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Owen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values
12. Refer to the testimony of James Owen, page 19, lines 11 through 14. Please identify and provide any legal authority, documents, studies, or other material reviewed or relied on by Mr. Owen to support his claim that an ROE even one dollar more than the *minimum* amount which is required to provide a fair opportunity for a utility to earn a reasonable return on investment is an unjust and unreasonable ROE.
13. Please refer to the testimony of James Owen beginning on page 19, line 18 and continuing through page 21. There, Mr. Owen's cites a report from S&P Global in support of his claim that the Company's requested ROE is too high.
- (a) Explain whether Mr. Owen conducted any independent study, analysis, or calculation to support his recommendation on what constitutes a reasonable return on equity for the Company.
 - (b) If the answer to (a) is affirmative, please provide all workpapers, source documents, and electronic spreadsheets used to support Mr. Owen's recommended return on equity. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
 - (c) Please confirm that Mr. Owen is not the author of the cited S&P Global report and was not involved in the creation of that report.

14. Refer to testimony of James Owen, page 25, lines 8 through 14. Please provide all facts, including any documents, studies, or reports, that support Mr. Owen's claim that raising the customer charge to \$17.50 would disincentivize residential customers to conserve energy or make energy efficiency investments.
15. Refer to the Direct Testimony of James Owen, page 32, lines 14 through 21. Mr. Owen states that the Company did not discuss alleged system-wide benefits or savings experienced during solar as part request to establish \$.03659/kWh as the avoided-cost rate in the Company's proposed N.M.S. II tariff but offers no rate design recommendations addressing those alleged benefits or savings. Confirm that the Joint Intervenors are not making any recommendations with respect to this aspect of the avoided-cost rate design.
16. Explain whether Mr. Owen 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.
17. Starting on page 44 of the Direct Testimony of James Owen, Mr. Owen discusses the "Pay As You Save" or "PAYS" program. Mr. Owen states that, under this program, the utility will bear the up-front cost of installed energy saving measures and then recover the costs of the energy savings measures on the customer's electric bills.
 - (a) Explain whether Mr. Owen has conducted any analysis or calculation of the cost to implement a PAYS program similar to the one he recommends the Company be required to develop.
 - (b) Explain whether Mr. Owen conducted any bill impact analysis regarding his recommendation that the Company establish a PAYS program.
 - (c) If the response to (a) and/or (b) is affirmative, provide a copy of the cost or bill impact analysis.
 - (d) Further, if the response to (a) and/or (b) is affirmative, provide 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.
18. Confirm that Mr. Owen authored Joint Intervenors' proposed "Pay As You Save On-Bill Program" tariff sheet, Schedule JO-2. If your response to the foregoing request is anything other than an unqualified confirmation, please identify the author or entity that created Schedule JO-2.

19. To the extent not provided in response to data request 5 and data request 6 above, please provide the following for each of the “manual calculations” identified in Mr. Owen’s testimony.
- (a) a copy of each source document or reference used; and
 - (b) the referenced “manual calculation.” The manual calculation, including all intermediate steps, should be provided in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used.
20. Please provide in electronic format, with formulas intact and visible, and no pasted values the calculation of “the year 5 impact” of “approximately \$1.73 per bill for RS customers” described at lines of 13-14 of page 57 of Mr. Owens’ testimony.

Respectfully submitted,



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