

**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. 2023-00159
REGULATORY ASSETS AND LIABILITIES; (4) A)
SECURITIZATION FINANCING ORDER; AND (5) ALL)
OTHER REQUIRED APPROVALS AND RELIEF)

**SUPPLEMENTAL DATA REQUESTS OF JOINT INTERVENORS
MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS' LAW CENTER,
KENTUCKIANS FOR THE COMMONWEALTH,
AND KENTUCKY SOLAR ENERGY SOCIETY**

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Dated: September 11, 2023

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “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.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. 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.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. 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.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. 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.
10. Unless otherwise specified in each individual interrogatory or request, the terms “you,” “your,” “Kentucky Power,” “KY Power,” “KPCo,” or “KP” refer collectively to Kentucky Power Company, including any parent or affiliated companies, predecessors-

in-interest, employees, authorized agents, outside consultants or contractors, or other representatives.

11. “Kentucky Power,” “KY Power,” “KPCo,” or “KP” means Kentucky Power Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and any parent or affiliated companies (including but not limited to American Electric Power Company (“AEP”) and its affiliated entities).

12. “The Company” means Kentucky Power.

13. “Joint Movants” means the Mountain Association, Appalachian Citizens’ Law Center, Kentuckians For The Commonwealth, and Kentucky Solar Energy Society, who have moved for the status of full joint intervention in this matter.

14. “AMP” means Average Monthly Payment.

15. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.

16. “CCR” means Coal Combustion Residuals.

17. “DCF” means Discounted Cash Flow.

18. “DRR” means Distribution Reliability Rider.

19. “ELG” means Effluent Limitation Guidelines.

20. “FERC” means Federal Energy Regulatory Commission.

21. “HEA” means Home Energy Assistance.

22. “HEART” means Home Energy Assistance in Reduced Temperatures.

23. “LIHEAP” means Low Income Home Energy Assistance Program.

24. “NPV” means Net Present Value.

25. “ROE” means Return on Equity.

26. “ROW” means Rights of Way.

27. “TEE” means Targeted Energy Efficiency.

28. "THAW" means Temporary Heating Assistance in Winter.

29. "TOR" means Trees Outside of Rights-of-Way.

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 requests for information are continuing in nature, and 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 Joint Movants. Any studies, 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 data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.

5. The answers provided should first restate the question asked and also identify the person(s) supplying the information.

6. 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.

7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Movants, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).

8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in sufficient detail so as to permit Joint Movants or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed,

please produce a “privilege log” that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Movants or the Commission to evaluate the validity of such claims.

9. 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.

10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SUPPLEMENTAL DATA REQUESTS PROPOUNDED TO KENTUCKY POWER COMPANY BY JOINT MOVANTS

- 2.1. Please refer to the Company's response to Staff Request 2-6, including the statement that "Each program included in the [Distribution Reliability Rider] Work Plan and recovered through the DRR will have a specific work order to track all costs, which are recorded to various FERC accounts."
- a. Within the "TOR – Enhanced ROW Widening" (see Ex. EGP-4) DRR program, please list each FERC account that costs will be assigned to (e.g., Accounts 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, etc.) and approximate percentages.
 - b. Within the "Additional Tie Lines" DRR program, please list each FERC account that costs will be assigned to and approximate percentages.
 - c. Within the "DACR/Recloser Modernization" DRR program, please list each FERC account that costs will be assigned to and approximate percentages.
 - d. Within the "Additional New Distribution Substation Sources" DRR program, please list each FERC account that costs will be assigned to and approximate percentages.
 - e. Within the "Asset Renewal/Storm Hardening or Resiliency" DRR program, please list each FERC account that costs will be assigned to and approximate percentages.
- 2.2. Please refer to the Company's response to Staff Request 2-12, including KPCO_R_KPSC_2_12_Attachment2.
- a. For each customer that received HEART assistance in the 2022/2023 program year, please state whether the customer received HEART or THAW assistance in each of the five preceding program years.
 - b. If the Company does not track, from year to year for each customer account, a history of billing that includes receipt of HEART funds, please explain why not.
 - c. For each customer that received THAW assistance in the 2022/2023 program year, please state whether the customer received HEART or THAW assistance in each of the five preceding program years.
 - d. If the Company does not track, from year to year for each customer account, a history of billing that includes receipt of THAW funds, please explain why not.
- 2.3. Please refer to the Company's response to Joint Intervenors' Request 1.21 and the Company's response to Staff Request 2-12, including KPCO_R_KPSC_2_12_Attachment2.
- a. Please provide the number of customers who received assistance from the TEE program annually from the years 2019 to 2023, and provide the

- dollar amount spent per customer for each program year.
- b. Please provide the number of customers that received assistance from both the Targeted Energy Efficiency (TEE) Program and one of the Company's HEA Programs (HEART or THAW) assistance in the 2022/2023 program year.
 - c. If the Company does not track whether participants in the HEART or THAW program also receive assistance from the TEE Program, please explain why not.
 - d. Does the Company have a process for referrals of participants in the HEART or THAW programs to the TEE program?
 - i. If so, please describe said process.
 - ii. If not, please explain why not.
 - e. Please refer to the TEE page on Kentucky Power's website, at <https://www.kentuckypower.com/savings/home/targeted-energy-efficiency>. Is the Company aware that the link to "contact the local community action agency in your county of residence" is broken?
- 2.4. If customers qualify for both the HEA Programs and federal LIHEAP program:
- a. Are they able to receive assistance from both programs? Please explain.
 - b. Do they automatically receive assistance from both programs? Please explain.
 - c. If they qualify for both programs, but are not able to receive assistance from both programs, is one program the default program? Please identify which program is the default program and/or describe any policies that determine which program the customer will receive assistance from.
 - d. Is the Company aware of any process for referrals of participants in the LIHEAP programs to the TEE program?
 - i. If so, please describe said process.
 - ii. If not, please explain why not.
- 2.5. Please identify the number of customers participating in the Company's Average Monthly Payment plan (AMP) in each of the last three calendar years.
- 2.6. Please refer to the direct testimony of Michael M. Spaeth, page 12–13, concerning the proposed optional seasonal provision for residential customers.
- a. In Mr. Spaeth's view, would the proposed seasonal provision more consistently reduce monthly bill volatility for all participants as compared to participating in the Company's Average Monthly Payment plan? Please explain why or why not in full.
 - b. Has the Company considered offering operational seasonal provisions for residential customers during summer months? Please explain in full.

- 2.7. Please refer to the direct testimony of Everett G. Phillips, page 16, and response to Staff’s Request No. 2-19. Please identify the specific data source(s) Mr. Phillips relied upon for the comparison of customers per distribution line mile.
- 2.8. Please refer to the direct testimony of Michael M. Spaeth, Exhibit MMS-7, and to the Company’s response to Joint Intervenors’ request 1.18(a). Please identify the special contract that is summarized in the exhibit and provide a copy of the special contract.
- 2.9. Please refer to the direct testimony of Cynthia G. Wiseman, page 19, lines 1–23.
- a. Has the Company quantified the “lower customer bill impacts” referenced in the testimony?
 - i. If yes, please provide that analysis, including any supporting workpapers.
 - ii. If not, please explain in detail why not.
 - b. Please explain why “the suspension of rider collection until securitization occurs . . . would be cash flow neutral compared to 2023.”
- 2.10. Please refer to the direct testimony of Cynthia G. Wiseman, page 22, lines 6–8.
- a. Has the Company quantified the extent to which “the measures . . . describe[d] above . . . offset and reduce its requested rate increase”?
 - i. If yes, please provide that analysis, including any supporting workpapers.
 - ii. If not, please explain in detail why not.
- 2.11. Please refer to the direct testimony of Timothy C. Kerns, page 13, lines 9–14.
- a. Please provide any supporting documentation in the Company’s possession, custody, or control concerning the need for the Mitchell Unit 2 Air Heater Basket Replacement Project.
 - b. Please provide a detailed breakdown of the total costs of the Mitchell Unit 2 Air Heater Basket Replacement Project, irrespective of whether the Company proposes to recover those costs from Kentucky Power ratepayers (i.e., inclusive of any costs that AEP’s West Virginia affiliate might seek to recover from ratepayers in a different jurisdiction).
 - c. Please identify the percentage of the Mitchell Unit 2 Air Heater Basket Replacement Project that is proposed to be borne by Kentucky ratepayers (as opposed to ratepayers in a different jurisdiction), and please explain in detail the Company’s rationale for this allocation.

- 2.12. Please refer to the direct testimony of Timothy C. Kerns, page 12, Figure TCK-3. For each generation capital addition listed for the Mitchell plant, please identify:
- a. Whether the dollar figure listed is the total amount that was spent at the Mitchell plant for that purpose, only the portion of the total expenditure that the Company seeks to recover from Kentucky ratepayers, or something else;
 - b. What percentage of the total expenditure the Company seeks to recover from Kentucky ratepayers, as opposed to ratepayers in a different jurisdiction, and the Company's rationale for this percentage.
- 2.13. Please refer to the direct testimony of Timothy C. Kerns, page 16, lines 12–20, and the Company's response to Staff Request 2-33.
- a. Please provide copies of the Company's "work orders to ensure costs related to the scope of work for each of the CCR and ELG projects are appropriately charged."
- 2.14. Please refer to the direct testimony of Adrien M. McKenzie, page 45, lines 4–13.
- a. Please provide the threshold values used to determine low and high end DCF results.
 - b. Please explain how the low and high end DCF value thresholds were determined, including supporting documentation and/or analyses to support these thresholds.
- 2.15. Please refer to the Company's response to Staff Request 2-1, Attachment 10, Messner workpaper.
- a. Please explain why the "conventional" regulatory asset calculations assume a flat payment each month (as shown in the "received from customers" column) for the entire recovery period, as with a mortgage payment.
 - b. In reality, would the regulatory asset's return of and on investment be recovered in rates through a flat monthly payment?
 - i. If yes, please explain why.
 - ii. If not, please explain how the costs would be passed through to rates, and how that would be calculated.
 - iii. If not, please explain why the NPV savings from securitization assumed that the conventional rate recovery of a regulatory asset would follow a flat payment.
 - c. If available, please provide the NPV savings assuming that the conventional rate recovery would be the same as any regulatory asset.

- d. If the regulatory asset were recovered in the manner described in (c), would that increase or decrease the savings from securitization? Please explain.
- 2.16. Please refer to the Company's response to Staff Request 2-1, Attachment 54, McKenzie workpaper.
- a. Please provide the underlying data and source for the "average utility bond yield" rates used in tab 9(2).
 - b. Please provide the assumed or actual bond rating for this data.
 - c. Please provide the earned ROE for the industry for the years shown on tab 9(2), for as many years as available.
- 2.17. Please refer to the direct testimony of Alex E. Vaughan, pages 27–34, regarding the Company's Distributed Solar Garden proposal, and the Company's response to Joint Intervenors' Request 1-25.
- a. Does the Company have any plans to upgrade or increase the number of substations on its distribution system in connection with installation of Company-owned solar garden facilities?
 - b. If a Company-owned solar garden facility gets to or above the maximum load of an associated substation, will other customers still be able to invest in customer-sited distributed solar utilizing the Company's distribution system?
- 2.18. Please refer to Section II, Exhibit D of the Company's Application, tariff sheets 2-14–2-15. For Residential Service customer billing:
- a. Please confirm that the Service and Energy Charges are reported as one combined charge on customer bills and are not being reported separately.
 - b. If so, please explain the reasoning for combining the Service and Energy Charges and reporting them as one combined charge on the bill. Please further explain how customers are able to know which portions of their bill are tied to volumetric energy consumption (kWh) and which are fixed charges?
 - c. Has the Company considered reporting these charges separately on customer bills, and would the Company be willing to do so? Please explain why or why not.
- 2.19. Please refer to Section II, Exhibit D of the Company's Application, tariff sheets 2-16–2-17. For General Service customer billing:
- a. Please confirm that the Monthly Service Charge, Energy Charge and Demand Charge are reported as one combined charge on customer bills and are not being reported separately.

- b. If so, please explain the reasoning for combining the Service, Energy, and Demand Charges and reporting them as one combined charge on the bill. Please further explain how customers are able to know which portions of their bill are tied to volumetric energy consumption (kWh) and which are fixed charges?
 - c. Has the Company considered reporting these charges separately on customer bills, and would the Company be willing to do so? Please explain why or why not.
- 2.20. Please refer to Section II, Exhibit D of the Company's Application, tariff sheets 2-18–2-19. For the Large General Service customer billing:
- a. Please confirm that the Monthly Service Charge, Energy Charge, Demand Charge, Excess Reactive Charge per KVA are reported as one combined charge on customer bills and are not being reported separately.
 - b. If so, please explain the reasoning for combining the Service, Energy, Demand, and Excess Reactive Charges and reporting them as one combined charge on the bill. Please further explain how customers are able to know which portions of their bill are tied to volumetric energy consumption (kWh) and which are fixed charges?
 - c. Has the Company considered reporting these charges separately on customer bills, and would the Company be willing to do so? Please explain why or why not.
- 2.21. Please refer to the Company's response to Joint Intervenors' Request 1.28, including KPCO_R_JI_1_28_Attachment1.
- a. Of the customers primarily heating their home with electric heating, please further specify what type of electric heating is used by the customer, such as boiler, furnace, heat pump, electric resistance, unit heater, or infrared. Please provide any analysis or work paper that supports your answer.
 - b. Has the Company considered specifically targeting energy efficiency measures toward customers who primarily heat their homes with electric resistance heating?
 - i. If yes, please explain how the Company has considered this and provide copies of any workpapers or other documents that support your answer.
 - ii. If not, please explain in detail why not.
- 2.22. Please refer to Ms. Cobern's Direct Testimony at pages 9–10, discussing the Company's Demand Side Management ("DSM") programs.
- a. Please confirm that the "DSM Market Potential Study" referenced in Ms. Cobern's testimony is the study filed on August 11, 2023, in Docket No.

2022-00392, available at https://psc.ky.gov/pscecf/2022-00392/mmcaldwell@aep.com/08112023035039/Closed/Notice_of_Filing_Market_Potential_Study.pdf.

- b. Has the Company evaluated the potential for additional DSM programs or additional funding of the current DSM programs to reduce the impact to customers of the rate increase requested in this rate case?
 - i. If so, please provide any relevant analysis or workpapers. If such analysis is in the DSM Market Potential Study identified above, please identify any relevant portions of the Study.
 - ii. If not, please explain why not.
 - c. On page 10, lines 3–4, Ms. Cobern states, “The Company intends to file an application to expand its DSM Programs within the next year.” Please identify with more specificity when during the next year the Company plans to file an application to expand its DSM Programs.
- 2.23. Please refer to the Company’s response to Joint Intervenors’ Request 1.25(d). Please provide the following information for Kentucky Power’s COGEN/SPP I and COGEN/SPP II customers, for the test year and each of the years between 2020 and 2022:
- a. For each year that COGEN/SPP I and COGEN/SPP II service customer meter reads fall within, the total delivered kWh and received kWh by rate class with connection behind the meter and total COGEN/SPP I generation and COGEN/SPP II generation when connection is in front of meter.
 - b. List the number COGEN/SPP I and COGEN/SPP II customers by specific rate class with connection behind the meter and total COGEN/SPP I customers and COGEN/SPP II customers with connections in front of the meter.
 - c. List total installed generation capacity (AC and DC) for customers receiving COGEN/SPP I and COGEN/SPP II customers by specific rate class with connection behind the meter and total COGEN/SPP I customers and COGEN/SPP II customers with connections in front of the meter.
 - d. For a customer that first began taking COGEN/SPP I with connection behind the meter in this timeframe, did that require replacing their meter or was COGEN/SPP I service achieved with reprogramming the existing meter? Does that answer depend on the existing rate class of customer-generator taking COGEN/SPP I service?
 - e. For a customer that first began taking COGEN/SPP II with connection behind the meter in this timeframe, did that require replacing their meter or was COGEN/SPP II service achieved with reprogramming the existing

meter? Does that answer depend on the existing rate class of customer-generator taking COGEN/SPP II service?

- f. What was the capacity (system size in KW AC) of each COGEN/SPP I service customer for each year?
 - g. What was the capacity (system size in KW AC) of each COGEN/SPP II service customer for each year?
 - h. For behind-the-meter connections, what was the total combined capacity for each rate class of COGEN/SPP I customers?
 - i. For behind-the-meter connections, what was the total combined capacity for each rate class of COGEN/SPP II customers?
 - j. For front-of-meter connections, what was the total combined capacity for each rate class of COGEN/SPP I customers?
 - k. For front-of-meter connections, what was the total combined capacity for each rate class of COGEN/SPP II customers?
 - l. What percentage of Kentucky Power's single-hour peak load for the previous year did COGEN/SPP I service represent for each year?
 - m. What percentage of Kentucky Power's single-hour peak load for the previous year did COGEN/SPP II service represent for each year?
 - n. Please provide any additional data concerning COGEN/SPP I or COGEN/SPP II service for the years 2020 through 2022 which Kentucky Power has reported to the U.S. Energy Information Administration, Federal Energy Regulatory Commission, the Kentucky Energy and Environment Cabinet, or any other regulatory agency.
- 2.24. Has the company explored ways to support customer investments in backup power to address customer ability to cope with distribution circuit challenges? For instance, meter socket-mounted transfer switches for customer invested backup power and storage, or replacing Open Delta three phase transformer services with appropriate service types that customer can connect customer invested interconnect distributed generation and storage to?

Respectfully submitted,



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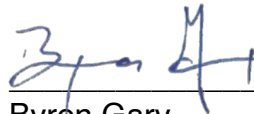
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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on September 11, 2023; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron Gary