

**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)

**RESPONSES OF JOINT INTERVENORS
MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS' LAW CENTER
KENTUCKIANS FOR THE COMMONWEALTH,
AND KENTUCKY SOLAR ENERGY SOCIETY
TO KENTUCKY POWER COMPANY'S
FIRST REQUESTS FOR INFORMATION
[DATED OCTOBER 16, 2023]**

FILED: October 30, 2023

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

**RESPONSE TO KENTUCKY POWER COMPANY'S
FIRST DATA REQUEST
Dated October 16, 2023**

Case No. 2023-00159

Question No. 1.1

Q-1.1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the Direct Testimony of Joint Intervenor Witness Joshua Bills (“Bills Testimony”) in electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Please see the attached workpapers, corresponding to Figure JB-1 and Figure JB-2. The tables in Mr. Bills’ testimony were created directly in the document; no additional workpapers or other documents exist responsive to this request.

ATTACHMENT:

01_KPCo_DR_1_JI_R_Attach to Q-1.1-JBills-Workpaper.xlsx

WITNESS: Joshua Bills

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

**RESPONSE TO KENTUCKY POWER COMPANY'S
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Case No. 2023-00159

Question No. 1.2

Q-1.2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the Bills Testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Please refer to Joint Intervenors' Response to Kentucky Power Company Request No. 1, to which are attached all workpapers used in the development of the Bills Testimony. Source documents used in the development of the Bills Testimony are identified in citations and publicly available. No other documents exist that are responsive to this request.

WITNESS: Joshua Bills

**JOINT INTERVENORS MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS'
LAW CENTER, KENTUCKIANS FOR THE COMMONWEALTH, AND
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**RESPONSE TO KENTUCKY POWER COMPANY'S
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Case No. 2023-00159

Question No. 1.3

Q-1.3. Please refer to the Bills Testimony at page 7, line 10. Please identify the citation for footnote 10 and provide a copy of any cited work in electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

The citation for footnote 10 was inadvertently not included in the final testimony filing. Footnote 10 should refer to the same document identified in the immediately preceding footnote 9, namely: Data from KPCo Response to Staff Question 1.15, Attach. 3.

WITNESS: Joshua Bills

**JOINT INTERVENORS MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS'
LAW CENTER, KENTUCKIANS FOR THE COMMONWEALTH, AND
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**RESPONSE TO KENTUCKY POWER COMPANY'S
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Case No. 2023-00159

Question No. 1.4

Q-1.4. Please provide all schedules, tables, and charts included in the testimony and exhibits to the Direct Testimony of Joint Intervenor Witness Andrew McDonald (“McDonald Testimony”) in electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Joint Intervenor refer the Company to the citations within the McDonald Testimony and attached exhibits. Exhibit AM-2 was submitted as an excel file in electronic format. Exhibit AM-3 is being submitted as an excel file as an attachment to this request. The McDonald Testimony relies on the Company’s worksheets and discovery responses, including: Kentucky Power Company’s Application, Kentucky Power Company’s Response to Commission Staff’s Question 2.1, and Kentucky Power Company’s Response to Commission Staff’s Question 1.15. All other schedules, tables, and charts are derived from the references linked in citations, all of which are publicly available.

ATTACHMENT:

02_KPCo_DR_1_JI_R_Attach to Q-1.4 AMcDonald-Workpaper Ex AM-3.xlsx

WITNESS: Andrew McDonald

**JOINT INTERVENORS MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS'
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**RESPONSE TO KENTUCKY POWER COMPANY'S
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Case No. 2023-00159

Question No. 1.5

Q-1.5. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the McDonald Testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Please refer to Joint Intervenors' Response to Kentucky Power Company Request No. 4, to which are attached all workpapers used in the development of the McDonald Testimony. Joint Intervenors are attaching the 2012 Staff Opinion referenced in Footnote 36 of the McDonald Testimony to the response to this question. All other source documents used in the development of the McDonald Testimony are identified in citations and publicly available.

ATTACHMENT:

03_KPCo_DR_1_JI_R_Attach to Q-1.5 AMcDonald-StaffOpinion2012.pdf

WITNESS: Andrew McDonald

**JOINT INTERVENORS MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS'
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**RESPONSE TO KENTUCKY POWER COMPANY'S
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Dated October 16, 2023**

Case No. 2023-00159

Question No. 1.6

Q-1.6. Please provide all schedules, tables, and charts included in the testimony and exhibits to the Direct Testimony of Joint Intervenor Witness Tyler Comings ("Comings Testimony") in electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

The tables in Mr. Comings' testimony were created directly in the document. No documents exist responsive to this request.

WITNESS: Tyler Comings

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

**RESPONSE TO KENTUCKY POWER COMPANY'S
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Case No. 2023-00159

Question No. 1.7

Q-1.7. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the Comings Testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

RESPONSE:

Please see the attached workpaper. Source documents used in the development of the Comings Testimony are identified in citations and/or attached as exhibits, all of which are publicly available. No other documents exist that are responsive to this request.

ATTACHMENT:

04_KPCo_DR_1_JI_R_Attach to Q-1.7_TComings-Workpaper.xlsx

WITNESS: Tyler Comings

**JOINT INTERVENORS MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS'
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Question No. 1.8

- Q-1.8. Starting on page 14 of the Bills Testimony, Mr. Bills discusses the “PAYS” program. Mr. Owen states that, under this program, the utility will bear the upfront 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. Bills 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. Bills 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.

RESPONSE:

Joint Intervenors note that there appears to be a typographical error in this request. Mr. James Owen was a witness for Joint Intervenors in Kentucky Power’s 2020 rate case, Case No. 2020-00174, but is not a witness in this proceeding. Joint Intervenors assume that this question refers in its entirety to Mr. Bills’ testimony in this proceeding and respond accordingly.

- a. No, and Mr. Bills agrees that specific cost and bill impact assessments would be appropriate before Kentucky Power Company proposes to implement a Pay As You

Save® (PAYS®) or Inclusive Utility Investment program.¹ Kentucky Power Company is in the best position to conduct such analyses specific to its service territory and rates. To the best of Mr. Bills' knowledge, Kentucky Power Company did not consider the possibility of introducing an Inclusive Utility Investment program before initiating this rate case.

Similarly, to Mr. Bills' knowledge, Kentucky Power Company does not appear to be analyzing Inclusive Utility Investment programs in its Demand-Side Management (DSM) and Energy Efficiency (EE) Program planning process, or otherwise, in advance of the Company's next DSM/EE plan proceeding.

Mr. Bills recommends, to the Company and the Commission, that an Inclusive Utility Investment program could contribute to meeting customers' energy needs, and the Company should make reasonable efforts to evaluate that program potential. Mr. Bills does not claim to have developed a turn-key program proposal for Kentucky Power Company.

Should Kentucky Power Company undertake a rigorous assessment of potential for an Inclusive Utility Investment program in its service territory, Mr. Bills individually and each of the organizations comprising Joint Intervenors would offer their support through any associated stakeholder processes.

Additionally, Mr. Bills would encourage Kentucky Power Company to consult with utilities and others that have successfully implemented Inclusive Utility Investment programs, including, for example, Ouachita Electric Cooperative Corporation (Ouachita ECC) in Camden, Arkansas. As reflected in the attached report, Ouachita ECC's customers broadly experienced high energy burdens and financial headwinds. Many homes were poorly insulated, with inefficient HVAC equipment or dependence on expensive delivered fuels. From 2016 to 2021, Ouachita ECC invested \$3,137,024 in its HELP PAYS® energy efficiency and electrification upgrade program, and reached nearly 400 homes and ten commercial properties (or roughly 6% of their customers). On average, those homes saved 3,218 kWh/yr. After Ouachita made program improvements several years into implementation, the savings improved, with participants since 2021 saving an average of 6,677 kWh/yr. Cumulative program savings at the end of 2020 were 1.1 million kWh and 250 kW of demand savings, continuing annually for another twelve years or more and generating substantial economic benefits for all Ouachita ECC member-owners.

¹ The term "Inclusive Utility Investment program" is synonymous with any tariffed on-bill financing program "based on best practices with strong consumer protections that is not tied to a trademark system, like Pay As You Save®." U.S. EPA, Inclusive Utility Investment: Expanding access to comprehensive efficiency and electrification upgrades, https://www.energystar.gov/products/inclusive_utility_investment (last updated May 2023) (last visited Oct. 30, 2023).

- b. Please see the response to subpart a.
- c. Not applicable.
- d. Not applicable.

ATTACHMENT:

05_KPCo_DR_1_JI_R_Attach to Q-1.8 JBills-ACEEE.pdf (Stephen E. Bickel et al., Utility value of a pay as you save inclusive utility investment program for whole home energy efficiency and electrification upgrades, ACEEE 2022 Summer Study for Energy Efficiency in Buildings (2022))

WITNESS: Joshua Bills

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Question No. 1.9

Q-1.9. Refer to page 32 of the Bills Testimony, lines 17 through 22.

- a. Please identify each GS customer that has expressed dissatisfaction regarding demand metering to Joint Intervenors.
- b. Please identify each GS customer of which Joint Intervenors are aware that is “not already equipped with a meter capable of measuring demand” but has “demand above 10kW some months.”

RESPONSE:

- a. Joint Intervenors object to the extent that the request seeks identification of individual customer information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Joint Intervenors respond as follows.

Please refer to pages 32–33 of Mr. Bills’ direct testimony, addressing impacts to small commercial customers, small churches, community centers, and others. Please also refer to pages 1–2 of Mr. Bills’ direct testimony, describing energy-related services provided by Mountain Association generally, and by Mr. Bills in particular, to small commercial and nonprofit Kentucky Power Company customers.

- b. Joint Intervenors object to the extent that the request seeks identification of individual customer information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, Joint Intervenors respond as follows.

Based on Kentucky Power Company’s own account and equipment records, the Company is presumably able to identify specific customers in the circumstances described in the request. Mr. Bills’ testimony focuses on circumstances he experienced working with small usage customers for whom application of a demand

charge poses a challenge and seems inequitable as compared to peers. Based on Mr. Bills' experience, some GS customers have meters capable of measuring demand and others do not. Mr. Bills does not know whether customers in classes subject to a demand charge, but whose meters are not capable of measuring demand, are or are not exceeding 10 kW of demand in any billing cycles.

WITNESS: Joshua Bills

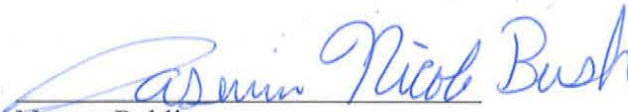
VERIFICATION

The undersigned, Joshua Bills, being first duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing responses and that the information contained therein is true and correct to the best of his information, knowledge, and belief, after reasonable inquiry.



Joshua Bills

Subscribed and sworn to before me by Joshua Bills this 30th day of October, 2023.



Notary Public

My commission expires: 4/17/2027



VERIFICATION

The undersigned, Andrew McDonald, being first duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing responses and that the information contained therein is true and correct to the best of his information, knowledge, and belief, after reasonable inquiry.

Andrew McDonald

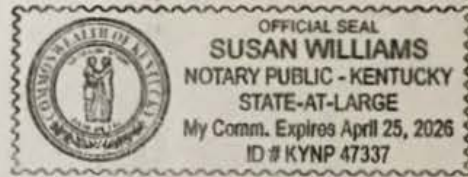
Andrew McDonald

Subscribed and sworn to before me by Andrew McDonald this 26 day of October, 2023.

Susan Williams

Notary Public

My commission expires: 4.25.2026




VERIFICATION

The undersigned, Tyler Comings, being first duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing responses and that the information contained therein is true and correct to the best of his information, knowledge, and belief, after reasonable inquiry.


Tyler Comings

Subscribed and sworn to before me by Tyler Comings this 26th day of October, 2023.


Notary Public

My commission expires: February 16, 2029

