

**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	)	

**Kentucky Power Company’s Data Requests to Joint Intervenors Mountain Association,  
Appalachian Citizens’ Law Center, Kentuckians for the Commonwealth, and Kentucky  
Solar Energy Society**

Pursuant to the Commission’s Order dated July 20, 2023, Kentucky Power Company propounds the following data requests to be answered by Mountain Association, Appalachian Citizens’ Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society (collectively, “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, Appalachian Citizens’ Law Center, Kentuckians for the Commonwealth, and/or Kentucky Solar Energy Society, their employees, and/or their agents, including Joshua Bills, Andrew McDonald, and Tyler Comings.
- “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 Direct Testimony of Joint Intervenor Witness Joshua Bills (“Bills Testimony”) 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 Bills Testimony. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
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.
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.
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.
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.
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.
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.

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.”

Respectfully submitted,



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