

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:)

ELECTRONIC APPLICATION OF KENTUCKY)
POWER COMPANY FOR: (1) APPROVAL TO)
EXPAND ITS TARGETED ENERGY EFFICIENCY)
PROGRAM; (2) APPROVAL OF A HOME ENERGY)
IMPROVEMENT PROGRAM AND A COMMERCIAL)
ENERGY SOLUTIONS PROGRAM; (3) AUTHORITY)
TO RECOVER COSTS AND NET LOST REVENUES,)
AND TO RECEIVE INCENTIVES ASSOCIATED)
WITH THE IMPLEMENTATION OF ITS)
DEMAND-SIDE MANAGEMENT/ENERGY)
EFFICIENCY PROGRAMS; (4) APPROVAL OF)
REVISED TARIFF D.S.M.C.; (5) ACCEPTANCE OF)
ITS ANNUAL DSM STATUS REPORT; AND (6) ALL)
OTHER REQUIRED APPROVALS AND RELIEF)

CASE NO. 2024-00115

**POST HEARING DATA REQUESTS OF JOINT INTERVENORS
MOUNTAIN ASSOCIATION, KENTUCKIANS FOR THE COMMONWEALTH,
APPALACHIAN CITIZENS' LAW CENTER, AND KENTUCKY SOLAR ENERGY
SOCIETY TO KENTUCKY POWER COMPANY**

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(not licensed in Kentucky):

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Center, Kentuckians for the Commonwealth,
and Kentucky Solar Energy Society*

Date: December 26, 2024

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 Company,” “KPC,” or 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 Company” or “KPC,” 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 “AEP” and its affiliated entities.

12. “The Company[s]” means Kentucky Power Company.
13. “Joint Intervenors” means Mountain Association, Kentuckians for the Commonwealth, Appalachian Citizens’ Law Center, and Kentucky Solar Energy Society, who have been granted full joint intervention in this matter.
14. “Commission” or “PSC” means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
15. “CAA” means Community Action Agency.
16. “DOE” means Department of Energy.
17. “DSM” means Demand-Side Management.
18. “EE” means Energy Efficiency.
19. “EISA” means Energy Independence and Security Act.
20. “EM&V” means Evaluation, Measurement, and Verification.
21. “GDS” means GDS Associates, Inc.
22. “HEA” means Home Energy Assistance.
23. "HEIP" means Home Energy Improvement Plan
24. “HVAC” means Heating, Ventilation, and Air Conditioning.
25. “IUI Programs” means Inclusive Utility Investment, Tariffed-on-Bill, or PAYS programs.
26. “MPS” means Market Potential Study.
27. “NEBs” means Non-Energy Benefits.
28. “PAYS” means Pay-as-You-Save®.[\[1\]](#)
29. “RFP” means Request for Proposal.
30. “T&D” means Transmission and Distribution.
31. “TEE” means Targeted Energy Efficiency.

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 Intervenors, 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 Intervenors 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.

**POST HEARING DATA REQUESTS PROPOUNDED TO
KENTUCKY POWER COMPANY BY JOINT INTERVENORS**

1.1 Please provide Witness Warren Hirons' resume or curriculum vitae.

1.2 To the extent not already provided in response to Post-Hearing Data Request 1.1, please provide a list of all Market Potential Studies Mr. Hirons has contributed to over the last ten years, and specify the entity or entities that requested and paid for each Market Potential Study.

1.3 Please refer to the Company's Responses to Staff 1.5 and 1.6.

- a. Please describe what is meant by "Max incentive level" in the middle column of the two figures provided in these data responses.
- b. Will the incentive level for the measures identified in these tables vary from customer-to-customer?
 - i. If so, please identify the criteria that will determine the level of incentive that an individual customer will qualify for, and who determines that level of incentive.

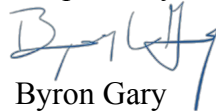
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Respectfully submitted,



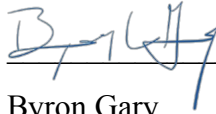
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CERTIFICATE OF SERVICE

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 December 26, 2024; 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