

Kentucky Power Company  
KPSC Case No. 2024-00115  
Joint Intervenors' First Set of Data Requests  
Dated June 21, 2024

**DATA REQUEST**

**JI 1\_17** For the TEE Program, for the period January 1, 2019 to June 1, 2024, please provide, on an annual basis, the number of customers who participated in the TEE Program who also received assistance from one of the Company's HEA Programs.

**RESPONSE**

The Company only retains this data on a rolling three-year basis. As such, the Company does not have information to provide the data requested for the period January 1, 2019 to June 2019. For the period from July 1, 2019 to June 1, 2024, of the 382 participants in the TEE program, 223 customers also received assistance from one of the Company's HEA programs. The breakdown by year is as follows:

- 2019: 48
- 2020: 25
- 2021: 51
- 2022: 47
- 2023: 34
- 2024: 18

**July 19, 2024 Supplemental Response**

The breakdown of the requested information by year is as follows:

- 2019: 48
- 2020: 25
- 2021: 51
- 2022: 47
- 2023: 34
- 2024 (January-June): 18

Witness: Barrett L. Nolen

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**DATA REQUEST**

- JI 1\_33** Please state whether the net lost revenues resulting from the DSM programs incorporated into the DSM Surcharge Factor is limited to first-year savings.
- a. If not, please explain why not, and over what time frame savings are incorporated into the DSM surcharge factor.

**RESPONSE**

The net lost revenues resulting from the DSM programs, incorporated into the DSM Surcharge Factor, is not limited to first year savings; it has been the Company's practice that net lost revenues are cumulative for up to three-years absent an intervening base case.

- a. Please see KPCO\_R\_JI\_1\_28\_Attachment1 for the 1995 application, which discusses how net lost revenues were determined.

**July 19, 2024 Supplemental Response**

For the proposed DSM programs that are the subject of the Company's Application in this proceeding, only the net lost revenues related to the first-year savings are included within the proposed DSM surcharge. However, as shown in the Company's revised Exhibit SEB-2, the proposed DSM surcharge also includes actual net lost revenues for the period October 1, 2023 (tab DSM 1.0, cell I13) through March 31, 2024 (tab DSM 1.0, cell I19) and the estimated net lost revenue for the period April 1, 2024, through December 31, 2024 (tab DSM 1.0, cell I37). These actual and estimated net lost revenues are associated with the Company's existing TEE program.

Witness: Tanner S. Wolfram

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**DATA REQUEST**

- JI 1\_60** Please refer to Exhibit BLN-1, the 2023 MPS.
- a.: Please provide the documents and/or links to documents that GDS leveraged to support the market potential study, including the Michigan Energy Measures Database, and the technical resource manuals for Indiana and Illinois.
- b.: Please provide all workpapers for the market potential study in fully functional Excel format with formulas intact.

**RESPONSE**

a. GDS used the following documents to support the market potential study:

- Illinois TRM: <https://www.ilsag.info/technical-reference-manual/>
- Michigan Energy Measures Database:  
<https://www.michigan.gov/mpsc/regulatory/ewr/michigan-energy-measures-database>
- Indiana TRM is provided as KPCO\_R\_JI\_1\_60\_Attachment1.

b. The requested information is confidential and proprietary information of GDS that the Company does not have full access to. The Company cannot provide this information to Joint Intervenors prior to the Joint Intervenors executing a non-disclosure agreement that would protect GDS' confidential and proprietary information. Upon execution of such non-disclosure agreements, the Company will supplement this response.

**July 19, 2024 Supplemental Response**

b. Please see KPCO\_SR\_JI\_1\_60\_ConfidentialAttachment2 and KPCO\_SR\_JI\_1\_60\_ConfidentialAttachment3 for the requested information.

Witness: Warren Hirons (GDS Associates)

KPCO\_SR\_JI\_1\_60\_ConfidentialAttachment2 is confidential in its entirety.

KPCO\_SR\_JI\_1\_60\_ConfidentialAttachment3 is confidential in its entirety.

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**DATA REQUEST**

- JI 1\_73** Please refer to the Company's Quick Reference Guides, Exhibits BLN-2 and BLN-3.
- a. Please provide the model, with workable cells, to support the calculations.
  - b. Please provide a list of all eligible measures and projected savings by programs and/or customer class.
  - c. Please provide a workable model for the calculation of benefit-cost test(s).

**RESPONSE**

a. and c. The requested information is confidential and proprietary information of GDS that the Company does not have full access to. The Company cannot provide this information to Joint Intervenors prior Joint Intervenors executing a non-disclosure agreement that would protect GDS' confidential and proprietary information. Upon execution of such non-disclosure agreements, the Company will supplement this response.

b. Please see KPCO\_R\_JI\_1\_73\_Attachment1 and KPCO\_R\_JI\_1\_73\_Attachment2 for the requested information.

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a. and c. Please see KPCO\_SR\_JI\_1\_73\_ConfidentialAttachment3 for the requested information.

b. Please see KPCO\_SR\_JI\_1\_73\_Attachment1 for these documents in excel format.

Witness: Barrett L. Nolen

Witness: Warren Hirons (GDS Associates)

KPCO\_SR\_JI\_1\_73\_ConfidentialAttachment3 is confidential in its entirety.



### Hirons Verification Form.doc

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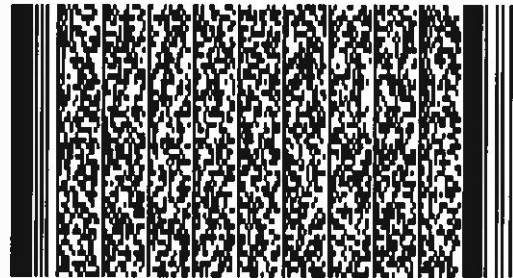
#### E-Signature Summary

**E-Signature 1: Warren Hirons (WH)**

July 19, 2024 09:31:00 -8:00 [D5D947E50DEE] [108.234.94.184]  
 warren.hirons@gdsassociates.com (Principal) (Personally Known)

**E-Signature Notary: Marilyn Michelle Caldwell (MMC)**

July 19, 2024 09:31:00 -8:00 [F75B3C2F1298] [167.239.221.101]  
 mmcaldwell@aep.com  
 I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



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