**DATA REQUEST**

**KYSEIA 1_1** Reference: Cobern Direct at 24:4-5 and Exhibit E, Tariff COGEN/SPP at 143.

a. In reference to the proposed new language which states "with cogeneration and/or small power production facilities having a total design capacity of more than 10 KW"; please explain how the Company will determine the "total design capacity". Please specifically:

i. Explain whether the determination will rely on AC or DC measurements.

ii. Explain what system component or components, such as the inverter, solar modules, a connected energy storage system, or any other component will be used in the determination.

iii. Provide detailed examples of how the determination would be made for storage-paired solar facilities under both AC-coupled and DC-coupled configurations.

b. Please confirm that the 10 kW threshold in the above proposed language will require all Qualifying Facilities under this tariff to take retail service from the Company under a demand-metered tariff. If this cannot be confirmed, please identify the other applicable tariff(s) and when such tariff(s) will be required.

c. Please explain how the Company selected 10 kW as an appropriate threshold for the demand rate service requirement in the Company's present Tariff COGEN/SPP I, as opposed to a different capacity threshold.

d. Please explain how the proposed language would be applied to a Qualifying Facility that sells to the Company under this tariff if the Company is not the interconnecting utility, i.e., a Qualifying Facility that receives retail service from another utility.

e. Please confirm that the proposed change to eligibility for Tariff COGEN/SPP would make Qualifying Facilities with "a net power production capacity" of less than 45 kW ineligible for Tariff COGEN/SPP, and explain what options are available to a Qualifying

Facility smaller than 45 kW if it cannot receive service under Tariff N.M.S. II.

f. Please explain what is meant by, or the definition of, the phrase "net power production capacity".

**RESPONSE**

a. Kentucky Power objects to this request as it mischaracterizes the Company's application. The language described in this request as "new" is not new language. This language was in the previously approved Tariff COGEN/SPP I, which was for cogeneration and small power production that was below 100 kw. The Company is proposing to combine COGEN/SPP I and COGEN SPP II into one and so this language, which still addresses cogeneration and small power production facilities with a total design capacity of less than 10kW needed to be carried into the new combined COGEN/SPP tariff. It appears as a redline in Exhibit E because it was one of the existing differences between the prior COGEN/SPP I and COGEN SPP II tariff. Subject to and without waiving this object, the Company responds as follows

i.-iii. The nameplate rating of a proposed distributed energy resource ("DER") is evaluated pursuant to the AEP Technical Interconnection and Interoperability Requirements ("TIIR"). In particular,

1. **Per the AEP's TIIR Section 4.15:** A DER Facility's nameplate rating is used for state level determination and tariff eligibility.
    a. A DER Facility's nameplate rating is the summation of the rated AC output capacity of all individual inverter-based and non-inverter-based resources that operate in parallel with Area EPS (grid-connected) behind a single Point of Common Coupling.
    b. For inverter-based solar systems, the nameplate AC output capacity of the interconnecting inverter is utilized, regardless of the amount of DC capacity provided solar modules.
    c. For inverter-based energy storage systems,
        i. If the storage component and inverter are sold as a single system/unit/model, the nameplate AC capacity of the system is utilized.

   ii. If the storage component and inverter are separate systems, the nameplate AC output capacity of the interconnecting inverter is utilized, regardless of the amount of DC capacity provided by the storage system.

d. When inverter-based solar and energy storage is DC coupled, the nameplate AC output capacity of the interconnecting inverter is utilized, regardless of the amount of DC capacity provided by solar modules or energy storage.

e. For non-inverter-based resources, such as synchronous generators, the equipment's nameplate AC output capacity is used.

b. Please see the Company's response to KPSC 2_3. The 45 kW lower limit was included in error and thus, if this is removed, there would be some customers who may be eligible to take service without a demand meter.

c. The 10 kW threshold, and the inclusion of a demand rate, ensures a more appropriate contribution to existing system costs. The objective is to recognize that, under Tariff COGEN/SPP, much of the kWh-based revenue will be netted out, making the demand component necessary to recover fixed system costs.

d. The Company is not obligated under PURPA to buy the output of a Qualifying Facility where it is not the interconnecting utility nor would the facility qualify for the Company's tariff.

e. Please see the Company's response to KPSC 2_3. The 45 kW lower limit was included in error and thus ,if this is removed, a project could take service under Tariff COGEN/SPP if it were under 45 kW.

f. This calculation can be found in FERC's Form 556 in the Technical Facility Information section at https://www.ferc.gov/media/form-no-556.

Witness: Michael M. Spaeth (c)

Witness: Tanner S. Wolffram (a, b, d, e, f)

**<u>November 3, 2025 Supplemental Response</u>**

d. The tariff would not apply to a QF that is not interconnected to the Company's distribution or transmission facilities. To the extent the Company is nonetheless obligated to purchase a non-interconnecting QF's energy or capacity, the Company will comply with its obligations under PURPA (*e.g.*, pursuant to a separate contract).

Witness: Tanner S. Wolffram

Kentucky Power Company
KPSC Case No. 2025-00257
KYSEIA's First Set of Data Requests
Dated September 29, 2025
Part 1 of 2

**DATA REQUEST**

**KYSEIA 1_4** Reference: Coburn Direct at 24:12-22 and Exhibit E, Tariff COGEN/SPP at 146.

a. With respect to the proposed language that states, "The Company shall not provide a prospective Cogen/SPP customer with a contract for service under this tariff until the customer has met the burden of establishing a legally enforceable obligation ("LEO") under PURPA." Please explain whether the Company will still make a contract available to Qualifying Facilities that choose the option to sell output to the Company on an as-available basis rather than pursuant to the LEO.

b. With respect to Term 1 regarding Qualifying Facility self-certification with the FERC. Please confirm that the Company is proposing to require the FERC certification for Qualifying Facilities that are 1 MW or smaller even though such Qualifying Facilities are exempt under FERC Order No. 732 from filing Form 556 with the FERC in order to be a Qualifying Facility.

c. Please confirm whether the LEO will be established by a Qualifying Facility on the date when the Qualifying Facility submits the information required in paragraphs 1 through 7 of this tariff section. If your response is anything other than an unqualified confirmation, please explain in detail all other information required or process steps required for a Qualifying Facility to establish the LEO.

d. Please explain what constitutes "the Company's satisfaction" in the statement "A LEO will be established for the Customer's facility when the following criteria have been met to the Company's satisfaction."

e. Please how the Company proposed to determine whether a prospective customer has made "meaningful steps to obtain site control" and provide examples of how that milestone can be met and the specific documentation required for verification.

**RESPONSE**

a. Tariff COGEN/SPP provides avoided cost pricing to QFs and cogeneration facilities that meet the requirements under PURPA. Establishing LEOs is a requirement under PURPA and, accordingly, if a project cannot establish LEOs, it will not meet the requirements under PURPA and the Company is not required to purchase the output of the facility.

b. Confirmed.

c-e. See the Company's response to KPSC 2_5

Witness: Tanner S. Wolffram

**November 3, 2025 Supplemental Response**

b. The Company's proposed tariff requires compliance with the referenced FERC regulations, which would include any exemptions provided for therein. To the extent a project is exempt from filing a Form No. 556, it would need to provide substantially the same information to the Company that would be included in Form No. 556 to demonstrate that it meets the requirements to be designated as a QF.

Witness: Tanner S. Wolffram

**VERIFICATION**

The undersigned, Tanner S. Wolffram, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Tanner S. Wolffram

Commonwealth of Kentucky )
) Case No. 2025-00257
County of Boyd )

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Tanner S. Wolffram, on November 3, 2025.

Marilyn Michelle Caldwell
Notary Public

MARILYN MICHELLE CALDWELL
Notary Public
Commonwealth of Kentucky
Commission Number KYNP71841
My Commission Expires May 5, 2027

My Commission Expires May 5, 2027

Notary ID Number KYNP71841