

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY)
FOR COLLABORATIVE DEMAND-SIDE MANAGEMENT)
PROGRAMS AND FOR AUTHORITY TO IMPLEMENT A) CASE NO. 2011-00300
TARIFF TO RECOVER COSTS AND NET LOST REVENUES)
AND RECEIVE INCENTIVES ASSOCIATED WITH THE)
IMPLEMENTATION OF THE KENTUCKY POWER)
COMPANY COLLABORATIVE DEMAND-SIDE)
MANAGEMENT PROGRAMS)

ATTORNEY GENERAL'S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Kentucky Power Co. ["KP"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following instructions:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness(es) who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KP with an electronic version of these data requests, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts

thereof) and if the original is not available, the best copy available. These terms include all information regardless of the medium or media in which they are recorded (including electronic media and e-mail), in any written, graphic or other tangible form including, but not necessarily limited to: all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards / records, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing,

drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents, as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

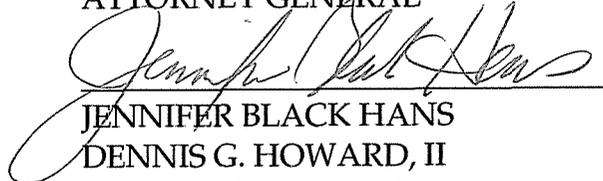
(12) In the event any document called for has been destroyed or transferred beyond the control of the company:

(a) please identify: (i) the person by whom it was destroyed and/or transferred; (ii) the transferee; and (iii) the person authorizing the destruction or transfer; and

(b) state: (i) the time, place, and method of destruction or transfer; and, (ii) the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



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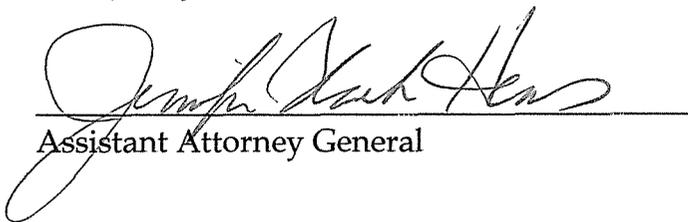
Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Lila P. Munsey
Manager, Regulatory Services
Kentucky Power
101A Enterprise Drive
Frankfort, KY 40601

Mark R. Overstreet
Stites & Harbison, PLLC
P.O. Box 634
Frankfort, KY 40602-0634

this 14th day of October, 2011



Assistant Attorney General

Application of Kentucky Power Company Regarding Collaborative
Demand-Side Management Programs
Case No. 2011-00300
Attorney General's Initial Data Requests

1. Please state whether any consideration was given to modifying any existing programs, or implementing a new program for weatherization of existing mobile homes.
 - a. If so, please provide complete details, including any and all options considered, and costs associated therewith, and potential energy savings.
2. Please state whether any polling of customers conducted to consider whether weatherization programs should be expanded.
 - a. If so, please provide complete details together with summaries of any relevant polling data.
3. Please state whether the KP and / or its DSM collaborative gave any consideration to revising the student education program.
 - a. If so, please provide complete details.
 - b. Has the company considered whether it would be more cost effective to eliminate the student education portion of this program, and instead focus on educating existing adult customers through bill inserts, advertisements, etc.?
4. Please provide the cost, in dollar amounts per month, that each customer pays for existing DSM programs, both for the residential and commercial classes.
 - a. Please provide the cost increase from the current year DSM sought to be recovered by the Application and broken down by each DSM program.
5. Please provide the cost, in dollar amounts, that each customer would pay in the event the Commission approves all of the new programs and changes to existing programs, both for the residential and commercial classes per month.
6. If KP's DSM charges to its customers will change in any way, please advise whether it offered public notice of the proposed increase in the DSM surcharge.
 - a. If so, please provide a copy of the notice provided. If not, please explain why public notice was not offered.

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7. Refer to page 18 of the TEE evaluation report, Recommendation 6, and to the Response to KPSC Data Request No. 10, regarding Kentucky Power's consideration of adding another employee to assist with DSM program management. In response to subpart (b), Kentucky Power states: "If KPC were to add an additional employee, the employee's costs would be recovered through base rates."
 - a. Explain why Kentucky Power would seek to recover the salary of an additional employee, hired to assist with DSM program management, through base rates instead of through the DSM surcharge.
 - b. Would that employee's job requirements be limited to DSM matters, or would it include other matters as well?
 - c. Provide legal authority for Kentucky Power's preference to recover this cost through base rates prior to filing a general rate case.
 - d. As requested by KPSC Data Request No. 10(b), please provide an estimate of the approximate salary and benefits costs that would be required to add an additional employee to assist with DSM management.