

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

The Application of Kentucky Power )  
Company to Withdraw Its Tariff RTP )  
Pending Submission by the Company ) Case No. 2012-00226  
And Approval by the Commission of )  
a New Real-Time Pricing Tariff )

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**KENTUCKY POWER COMPANY'S DATA REQUESTS TO  
KENTUCKY INDUSTRIAL CUSTOMERS, INC.**

Pursuant to the Commission's Order dated June 21, 2012, Kentucky Power Company propounds the following data requests to be answered by Kentucky Industrial Customers, Inc. and each its members participating in this proceeding:<sup>1</sup>

**DEFINITIONS**

1. "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.
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

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<sup>1</sup> See Petition to Intervene of Kentucky Industrial Utility Customers, Inc., *In the Matter of: The Application Of Kentucky Power Company To Withdraw Its Tariff RTP Pending Submission Of By The Company And Approval By The Commission Of A New Real-Time Pricing Tariff*, Case No. 2012-00226 at ¶ 1 (Filed June 7, 2012) ("The members of KIUC who will participate herein are: Air Liquide Large Industries U.S. LP, AK Steel Corporation, Air Products & Chemicals, Inc., EQT Corporation and Catlettsburg Refining LLC, a subsidiary of Marathon Petroleum LP.")

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 residence address, his or her present 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.), 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 Company's possession or subject to its control, state what disposition was made of it.

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. "Identify" used in a fashion other than as described in instructions 3-6 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.

8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

10. 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.

11. "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.

12. "Marathon" means Catlettsburg Refining LLC, its parent Marathon Petroleum Company LP, and all subsidiaries of Marathon Petroleum Company LP.

13. "Air Liquide" means Air Liquide Large Industries U.S. LP, its parent American Air Liquide Holdings, Inc., and all subsidiaries of American Air Liquide Holdings, Inc.
14. "AK Steel" means AK Steel Corporation, AK Steel Holding Corporation, AK Tube LLC, AK Coal Resources, Inc., and Magnetation LLC.
15. "Air Products" means Air Products and Chemicals, Inc., and all subsidiaries of Air Products and Chemicals, Inc.
16. "EQT" means EQT Gathering LLC – Jenkins Compressor Station, EQT Gathering LLC – Oliver Compressor Station, EQT Gathering LLC – Blackberry Compressor Station, EQT Gathering LLC – Myra Compressor Station, EQT Gathering LLC – Perry Compressor Station, EQT Gathering LLC – Right Beaver Compressor Station, EQT Gathering LLC – Rockhouse Compressor Station, and EQT Gathering LLC – Derby Compressor Station, EQT Corporation and all subsidiaries and affiliates of EQT Corporation including, but not limited to, EQT Energy, LLC, EQT Gathering Equity, LLC, EQT Gathering of Kentucky, Inc., EQT Gathering, Inc., EQT Gathering, LLC, EQT Midstream Partners, LP, EQT Midstream Services, LLC, and EQT Production Company.
17. "KIUC" means Kentucky Industrial Utility Customers, Inc. and its members.
18. "Kentucky Power" or "Company" means Kentucky Power Company.
19. "Tariff R.T.P." means Kentucky Power's current Tariff R.T.P.
20. "Rider R.T.P." means Kentucky Power's proposed Rider R.T.P.

### **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. For the period April 20, 2007 through the present, please provide the following:
  - a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Tariff R.T.P. on Marathon or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.
  - b. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to any evaluation or consideration by Marathon of taking service under Tariff R.T.P. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.
  - c. Copies of all documents relating to or regarding Tariff R.T.P. Documents produced in response to subparts (a) or (b) of this data request need not be produced in response to this subpart. All calculations and supporting

analyses should be provided in electronic format with formulas intact and unprotected.

2. For the period April 20, 2007 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Tariff R.T.P. on Air Liquide or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to any evaluation or consideration by Ari Liquide of taking service under Tariff R.T.P. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

c. Copies of all documents relating to or regarding Tariff R.T.P. Documents produced in response to subparts (a) or (b) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

3. For the period April 20, 2007 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Tariff R.T.P. on AK Steel or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to any evaluation or consideration by AK Steel of taking service under Tariff R.T.P. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

c. Copies of all documents relating to or regarding Tariff R.T.P. Documents produced in response to subparts (a) or (b) of this data request need

not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

4. For the period April 20, 2007 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Tariff R.T.P. on Air Products or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to any evaluation or consideration by Air Products of taking service under Tariff R.T.P. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

c. Copies of all documents relating to or regarding Tariff R.T.P. Documents produced in response to subparts (a) or (b) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

5. For the period April 20, 2007 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Tariff R.T.P. on EQT or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to any evaluation or consideration by EQT of taking service under Tariff R.T.P. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

c. Copies of all documents relating to or regarding Tariff R.T.P. Documents produced in response to subparts (a) or (b) of this data request need

not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

6. For the period April 20, 2007 through the present, please provide the following:

a. Copies of all non-privileged documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Tariff R.T.P. on KIUC members (other than those members listed in Data Requests 1-5 above) or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all non-privileged KIUC documents, or communications to or from KIUC, relating to or regarding Tariff R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

7. For the period June 11, 2012 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Rider R.T.P. on Marathon or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents relating to or regarding Rider R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

8. For the period June 11, 2012 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Rider

R.T.P. on Air Liquide or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents relating to or regarding Rider R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

9. For the period June 11, 2012 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Rider R.T.P. on AK Steel or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents relating to or regarding Rider R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

10. For the period June 11, 2012 through the present, please provide the following:

a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Rider R.T.P. on Air Products or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents relating to or regarding Rider R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

11. For the period June 11, 2012 through the present, please provide the following:



a. Copies of all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Rider R.T.P. on EQT or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all documents relating to or regarding Rider R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

12. For the period June 11, 2012 through the present, please provide the following:

a. Copies of all non-privileged documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that evaluate or describe the economic or financial impact of Rider R.T.P. on KIUC members (other than those members listed in data requests 7-11 above) or Kentucky Power. Include a description of each such study, analysis, or evaluation and each assumption made in the study, analysis, or evaluation. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

b. Copies of all non-privileged KIUC documents, or communications to or from KIUC, relating to or regarding Rider R.T.P. Documents produced in response to subpart (a) of this data request need not be produced in response to this subpart. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

13. For the period 2007 through the present please identify any real time pricing tariffs or riders that were available to Marathon (including any affiliated entity). For each such tariff or rider please identify:

a. The name of the supplier offering service under the tariff or rider;

b. Whether Marathon (including any affiliated entity) took or is taking service under the tariff or rider.

14. For the period 2007 through the present please identify any real time pricing tariffs or riders that were available to Air Liquide (including any affiliated entity). For each such tariff or rider please identify:

- a. The name of the supplier offering service under the tariff or rider;
- b. Whether Air Liquide (including any affiliated entity) took or is taking service under the tariff or rider.

15. For the period 2007 through the present please identify any real time pricing tariffs or riders that were available to AK Steel (including any affiliated entity). For each such tariff or rider please identify:

- a. The name of the supplier offering service under the tariff or rider;
- b. Whether AK Steel (including any affiliated entity) took or is taking service under the tariff or rider.

16. For the period 2007 through the present please identify any real time pricing tariffs or riders that were available to Air Products (including any affiliated entity). For each such tariff or rider please identify:

- a. The name of the supplier offering service under the tariff or rider;
- b. Whether Air Products (including any affiliated entity) took or is taking service under the tariff or rider.

17. For the period 2007 through the present please identify any real time pricing tariffs or riders that were available to EQT (including any affiliated entity). For each such tariff or rider please identify:

- a. The name of the supplier offering service under the tariff or rider;
- b. Whether EQT (including any affiliated entity) took or is taking service under the tariff or rider.

18. Please refer to page 1 of "Response and Motion to Dismiss of Kentucky Industrial Utility Customers, Inc. In Opposition To Application To Withdraw Tariff RTP," pages 6-7 of the June 20, 2012 "Reply of Kentucky Industrial Utility Customers, Inc. to Response of Kentucky Power Company," and page 16 footnote 4, page 22, lines 20-21, and page 23, lines 1-11 of Mr. Baron's

testimony. For the period April 20, 2007 through June 30, 2012, please identify each separate instance in which Marathon investigated or otherwise considered taking service under Tariff R.T.P. For each such instance, please identify:

- a. The date or dates of the investigation or consideration;
- b. The persons involved in the investigation and consideration;
- c. The factors considered in the investigation or consideration;
- d. The resolution of the investigation or consideration; *i.e.* whether Marathon elected to take service under Tariff R.T.P. as a result of the investigation or consideration;
- e. The reasons relied upon to resolve the investigation or consideration in the manner indicated in the response to subpart (d). Also, please provide all studies, evaluations, and analyses consulted, relied upon, or used in connection with the investigation or consideration. All calculations and supporting studies, evaluations, and analyses should be provided in electronic format with formulas intact and unprotected;
- f. whether as part of the investigation or consideration Marathon investigated or considered:
  - (i) shifting load from higher priced periods to lower priced periods, and if so, the amount(s) of load considered. If yes, please also identify the basis for considering or investigating the amount(s) of load to be shifted from higher priced periods to lower priced periods;
  - (ii) reducing its peak load, and if so, the amount of peak load to be reduced. If yes, please also identify the basis for considering or investigating the amount(s) of peak load to be reduced;
  - (iii) adding new load during lower priced periods, and if so, the amount(s) of load to be added during lower priced periods. If yes, please also identify the basis for considering or investigating the identified amount(s) of new load to be added during lower priced periods.

19. Please refer to page 1 of "Response of Kentucky Industrial Utility Customers, Inc. In Opposition To Application To Withdraw Tariff RTP," pages 6-7 of the June 20, 2012 "Reply of Kentucky Industrial Utility Customers, Inc. to Response of Kentucky Power Company, and page 16, footnote 4, page 22, lines 20-21, and page 23, lines 1-11 of Mr. Baron's testimony. For the period April 20, 2007 through June 30, 2012, please identify each separate instance in which Air Liquide investigated or otherwise considered taking service under Tariff R.T.P. For each such instance, please identify:

- a. The date or dates of the investigation or consideration;
- b. The persons involved in the investigation and consideration;
- c. The factors considered in the investigation or consideration;
- d. The resolution of the investigation or consideration; *i.e.* whether Air Liquide elected to take service under Tariff R.T.P. as a result of the investigation or consideration;
- e. The reasons relied upon to resolve the investigation or consideration in the manner indicated in the response to subpart (d). Also, please provide all studies, evaluations, and analyses consulted, relied upon, or used in connection with the investigation or consideration. All calculations and supporting studies, evaluations, and analyses should be provided in electronic format with formulas intact and unprotected;
- f. whether as part of the investigation or consideration Air Liquide investigated or considered:
  - (i) shifting load from higher priced periods to lower priced periods, and if so, the amount(s) of load considered. If yes, please also identify the basis for considering or investigating the amount(s) of load to be shifted from higher priced periods to lower priced periods;
  - (ii) reducing its peak load, and if so, the amount of peak load to be reduced. If yes, please also identify the basis for considering or investigating the amount(s) of peak load to be reduced;
  - (iii) adding new load during lower priced periods, and if so, the amount(s) of load to be added during lower priced periods. If yes, please also identify the basis for considering or investigating the identified amount(s) of new load to be added during lower priced periods.

20. Please refer to page 1 of "Response of Kentucky Industrial Utility Customers, Inc. In Opposition To Application To Withdraw Tariff RTP," pages 6-7 of the June 20, 2012 "Reply of Kentucky Industrial Utility Customers, Inc. to Response of Kentucky Power Company, and page 16, footnote 4, page 22, lines 20-21, and page 23, lines 1-11 of Mr. Baron's testimony. For the period April 20, 2007 through June 30, 2012, please identify each separate instance in which AK Steel investigated or otherwise considered taking service under Tariff R.T.P. For each such instance, please identify:

- a. The date or dates of the investigation or consideration;
- b. The persons involved in the investigation and consideration;
- c. The factors considered in the investigation or consideration;

d. The resolution of the investigation or consideration; *i.e.* whether AK Steel elected to take service under Tariff R.T.P. as a result of the investigation or consideration;

e. The reasons relied upon to resolve the investigation or consideration in the manner indicated in the response to subpart (d). Also, please provide all studies, evaluations, and analyses consulted, relied upon, or used in connection with the investigation or consideration. All calculations and supporting studies, evaluations, or analyses should be provided in electronic format with formulas intact and unprotected;

f. whether as part of the investigation or consideration AK Steel investigated or considered:

(i) shifting load from higher priced periods to lower priced periods, and if so, the amount(s) of load considered. If yes, please also identify the basis for considering or investigating the amount(s) of load to be shifted from higher priced periods to lower priced periods;

(ii) reducing its peak load, and if so, the amount of peak load to be reduced. If yes, please also identify the basis for considering or investigating the amount(s) of peak load to be reduced;

(iii) adding new load during lower priced periods, and if so, the amount(s) of load to be added during lower priced periods. If yes, please also identify the basis for considering or investigating the identified amount(s) of new load to be added during lower priced periods.

21. Please refer to page 1 of "Response of Kentucky Industrial Utility Customers, Inc. In Opposition To Application To Withdraw Tariff RTP," pages 6-7 of the June 20, 2012 "Reply of Kentucky Industrial Utility Customers, Inc. to Response of Kentucky Power Company, and page 16, note 4, page 22, lines 20-21, and page 23, lines 1-11 of Mr. Baron's testimony. For the period April 20, 2007 through June 30, 2012, please identify each separate instance in which Air Products investigated or otherwise considered taking service under Tariff R.T.P. For each such instance, please identify:

a. The date or dates of the investigation or consideration;

b. The persons involved in the investigation and consideration;

c. The factors considered in the investigation or consideration;

d. The resolution of the investigation or consideration; *i.e.* whether Air Products elected to take service under Tariff R.T.P. as a result of the investigation or consideration;

e. The reasons relied upon to resolve the investigation or consideration in the manner indicated in the response to subpart (d). Also, please provide all studies, evaluations, and analyses consulted, relied upon, or used in connection with the investigation or consideration. All calculations and supporting studies, evaluations, or analyses should be provided in electronic format with formulas intact and unprotected;

f. whether as part of the investigation or consideration Air Products investigated or considered:

(i) shifting load from higher priced periods to lower priced periods, and if so, the amount(s) of load considered. If yes, please also identify the basis for considering or investigating the amount(s) of load to be shifted from higher priced periods to lower priced periods;

(ii) reducing its peak load, and if so, the amount of peak load to be reduced. If yes, please also identify the basis for considering or investigating the amount(s) of peak load to be reduced;

(iii) adding new load during lower priced periods, and if so, the amount(s) of load to be added during lower priced periods. If yes, please also identify the basis for considering or investigating the identified amount(s) of new load to be added during lower priced periods.

22. Please refer to page 1 of "Response of Kentucky Industrial Utility Customers, Inc. In Opposition To Application To Withdraw Tariff RTP," pages 6-7 of the June 20, 2012 "Reply of Kentucky Industrial Utility Customers, Inc. to Response of Kentucky Power Company, and page 16, note 4, page 22, lines 20-21, and page 23, lines 1-11 of Mr. Baron's testimony. For the period April 20, 2007 through June 30, 2012, please identify each separate instance in which EQT investigated or otherwise considered taking service under Tariff R.T.P. For each such instance, please provide separately and individually for EQT Gathering LLC – Jenkins Compressor Station, EQT Gathering LLC – Oliver Compressor Station, EQT Gathering LLC – Blackberry Compressor Station, EQT Gathering LLC – Myra Compressor Station, EQT Gathering LLC – Perry Compressor Station, EQT Gathering LLC – Right Beaver Compressor Station, EQT Gathering LLC – Rockhouse Compressor Station, and EQT Gathering LLC – Derby Compressor Station:

- a. The date or dates of the investigation or consideration;
- b. The persons involved in the investigation and consideration;
- c. The factors considered in the investigation or consideration;

d. The resolution of the investigation or consideration; *i.e.* whether EQT elected to take service under Tariff R.T.P. as a result of the investigation or consideration;

e. The reasons relied upon to resolve the investigation or consideration in the manner indicated in the response to subpart (d). Also, please provide all studies, evaluations, and analyses consulted, relied upon, or used in connection with the investigation or consideration. All calculations and supporting studies, evaluations, or analyses should be provided in electronic format with formulas intact and unprotected;

f. whether as part of the investigation or consideration EQT investigated or considered:

(i) shifting load from higher priced periods to lower priced periods, and if so, the amount(s) of load considered. If yes, please also identify the basis for considering or investigating the amount(s) of load to be shifted from higher priced periods to lower priced periods;

(ii) reducing its peak load, and if so, the amount of peak load to be reduced. If yes, please also identify the basis for considering or investigating the amount(s) of peak load to be reduced;

(iii) adding new load during lower priced periods, and if so, the amount(s) of load to be added during lower priced periods. If yes, please also identify the basis for considering or investigating the identified amount(s) of new load to be added during lower priced periods.

23. Please refer to page 17, lines 19-22 of Mr. Baron's testimony. Please identify all returns on equity for Kentucky Power Mr. Baron contends are "serious enough to condone revising a previously approved Settlement." In answering this data request also please provide:

a. each fact upon which Mr. Baron premises his answer; and

b. all analyses and supporting work papers relied upon, consulted, or used by Mr. Baron. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

24. Please refer to page 24, lines 3-5, and page 24, line 9, of Mr. Baron's testimony. If Tariff RTP is continued beyond June 30, 2013 as Mr. Baron testifies he believes it should be, identify in detail how KIUC proposes to allocate any lost revenues. In answering this data request also please:

- a. identify the tariff classes to which the lost revenues should be allocated;
- b. the percentage of lost revenues Mr. Baron believes should be allocated to each identified tariff class; and
- c. the basis, including all supporting facts, studies, evaluations and analysis relied upon, consulted, or used by Mr. Baron in making the allocation or answering the other parts of this data request. All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

25. Please refer to pages 3 (lines 15-20) and 4 (lines 6-10) and Exhibit SJB-1. Please provide a copy of any testimony or other public filing or publication by Mr. Baron's relating to or addressing electric real time pricing.

26. Please refer to pages 10 (lines 1-3), 11 (lines 20-22), and 12 (lines 1-2) of Mr. Baron's testimony. For the period July 1, 2012 to present, please identify, produce, and describe all "internal economic evaluations" performed by or on behalf of Marathon "for the purpose of optimizing ... [its] use of electricity" under Tariff R.T.P. For each such evaluation please:

- a. indicate the date of the evaluation;
- b. describe in detail the results of the evaluation;
- c. describe in detail any actions taken in response to the evaluation;
- d. describe in detail the production processes, market demand, prices for its products, and overall economic impact of all of Marathon's production costs considered in connection with the evaluation; and
- e. produce all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to the "internal economic evaluations." All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

27. Please refer to pages 10 (lines 1-3), 11 (lines 20-22), and 12 (lines 1-2) of Mr. Baron's testimony. For the period July 1, 2012 to present, please identify, produce, and describe all "internal economic evaluations" performed by or on



behalf of AK Steel “for the purpose of optimizing ... [its] use of electricity” under Tariff R.T.P. For each such evaluation please:

- a. indicate the date of the evaluation;
- b. describe in detail the results of the evaluation;
- c. describe in detail any actions taken in response to the evaluation;
- d. describe in detail the production processes, market demand, prices for its products, and overall economic impact of all of AK Steel’s production costs considered in connection with the evaluation; and
- e. produce all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to the “internal economic evaluations.” All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

28. Please refer to pages 10 (lines 1-3), 11 (lines 20-22), and 12 (lines 1-2) of Mr. Baron’s testimony. For the period July 1, 2012 to present, please identify, produce, and describe all “internal economic evaluations” performed by or on behalf of Air Products “for the purpose of optimizing ... [its] use of electricity” under Tariff R.T.P. For each such evaluation please:

- a. indicate the date of the evaluation;
- b. describe in detail the results of the evaluation;
- c. describe in detail any actions taken in response to the evaluation;
- d. describe in detail the production processes, market demand, prices for its products, and overall economic impact of all of Air Products’ production costs considered in connection with the evaluation; and
- e. produce all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to the “internal economic evaluations.” All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

29. Please refer to pages 10 (lines 1-3), 11 (lines 20-22), and 12 (lines 1-2) of Mr. Baron’s testimony. For the period July 1, 2012 to present, please identify, produce, and describe separately and individually all “internal economic evaluations” performed by or on behalf of EQT Gathering LLC – Jenkins Compressor Station, EQT Gathering LLC – Oliver Compressor Station, EQT Gathering LLC – Blackberry Compressor Station, EQT Gathering LLC – Myra Compressor Station, EQT Gathering LLC – Perry Compressor Station, EQT

Gathering LLC – Right Beaver Compressor Station, and EQT Gathering LLC – Rockhouse Compressor Station “for the purpose of optimizing ... [each entity’s] use of electricity” under Tariff R.T.P. For each such evaluation please:

- a. indicate the date of the evaluation;
- b. describe in detail the results of the evaluation;
- c. describe in detail any actions taken in response to the evaluation;
- d. describe in detail the production processes, market demand, prices for its products, and overall economic impact of all of the production costs of EQT Gathering LLC – Jenkins Compressor Station, EQT Gathering LLC – Oliver Compressor Station, EQT Gathering LLC – Blackberry Compressor Station, EQT Gathering LLC – Myra Compressor Station, EQT Gathering LLC – Perry Compressor Station, EQT Gathering LLC – Right Beaver Compressor Station, and EQT Gathering LLC – Rockhouse Compressor Station considered in connection with the evaluation; and
- e. produce all documents, communications, studies, memoranda, e-mails, analyses, evaluations, spreadsheets, and other writings (including notes and drafts) that relate to the “internal economic evaluations.” All calculations and supporting analyses should be provided in electronic format with formulas intact and unprotected.

30. Please refer to page 9 (lines 14-22) and page 10 (lines 1-7) of Mr. Baron’s testimony. For each calendar monthly period from July 1, 2012 to present please:

- a. identify by amount, date, and time (in fifteen minute intervals) the load, if any, Marathon shifted from a higher priced period to a lower priced period.
- b. identify by amount, date, and time (in fifteen minute intervals) the new load, if any, Marathon added to a lower priced period.
- c. identify the basis for any actions identified in response to subparts (a) and (b) to this data request, including, but not limited to, operating requirements, forced shut downs or limitations of operations, emergencies, and previously planned shut downs or limitations of operations.

31. Please refer to page 9 (lines 14-22) and page 10 (lines 1-7) of Mr. Baron’s testimony. For each calendar monthly period from July 1, 2012 to present please:

- a. identify by amount, date, and time (in fifteen minute intervals) the load, if any, AK Steel shifted from a higher priced period to a lower priced period.

b. identify by amount, date, and time (in fifteen minute intervals) the new load, if any, AK Steel added to a lower priced period.

c. identify the basis for any actions identified in response to subparts (a) and (b) to this data request, including, but not limited to, operating requirements, forced shut downs or limitations of operations, emergencies, and previously planned shut downs or limitations of operations.

32. Please refer to page 9 (lines 14-22) and page 10 (lines 1-7) of Mr. Baron's testimony. For each calendar monthly period from July 1, 2012 to present please:

a. identify by amount, date, and time (in fifteen minute intervals) the load, if any, Air Products shifted from a higher priced period to a lower priced period;

b. identify by amount, date, and time (in fifteen minute intervals) the new load, if any, Air Products added to a lower priced period.

c. identify the basis for any actions identified in response to subparts (a) and (b) to this data request, including, but not limited to, operating requirements, forced shut downs or limitations of operations, emergencies, and previously planned shut downs or limitations of operations.

33. Please refer to page 9 (lines 14-22) and page 10 (lines 1-7) of Mr. Baron's testimony. For each calendar monthly period from July 1, 2012 to present please:

a. identify separately and individually by amount, date, and time (in fifteen minute intervals) the load, if any, EQT Gathering LLC – Jenkins Compressor Station, EQT Gathering LLC – Oliver Compressor Station, EQT Gathering LLC – Blackberry Compressor Station, EQT Gathering LLC – Myra Compressor Station, EQT Gathering LLC – Perry Compressor Station, EQT Gathering LLC – Right Beaver Compressor Station, and EQT Gathering LLC – Rockhouse Compressor Station each shifted from a higher priced period to a lower priced period;

b. identify by amount, date, and time (in fifteen minute intervals) the new load, if any, EQT Gathering LLC – Jenkins Compressor Station, EQT Gathering LLC – Oliver Compressor Station, EQT Gathering LLC – Blackberry Compressor Station, EQT Gathering LLC – Myra Compressor Station, EQT Gathering LLC – Perry Compressor Station, EQT Gathering LLC – Right Beaver Compressor Station, and EQT Gathering LLC – Rockhouse Compressor Station each added to a lower priced period.

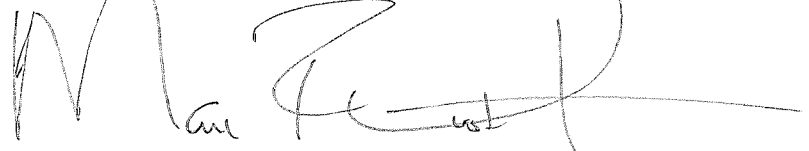
c. identify the basis for any actions identified in response to subparts (a) and (b) to this data request, including, but not limited to, operating requirements, forced shut downs or limitations of operations, emergencies, and previously planned shut downs or limitations of operations.

34. Please refer to pages 8-9 of the "Response And Motion To Dismiss Of Kentucky Industrial Utility Customers, Inc. In Opposition To Application To Withdraw Tariff RTP" which include the statement: "Marathon was repeatedly assured that cost savings could be achieved while having the customer maintain the same production schedule." For each such assurance referred to in the identified portion of the Response and Motion To Dismiss please identify:

- a. The date and place the assurance was made;
- b. All persons present at the time of the assurance;
- c. The Kentucky Power representative making the assurance;
- d. The statements used to convey the assurance;

Please produce all documents, e-mails and other communications or physical recordings evidencing or memorializing the assurances.

Respectfully submitted,



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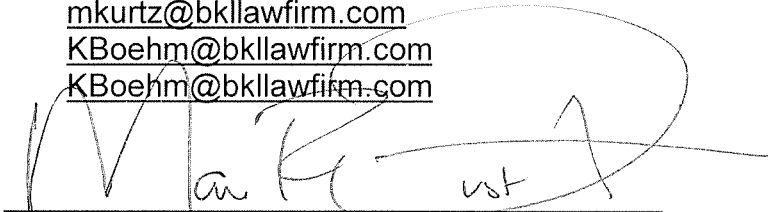
COUNSEL FOR KENTUCKY POWER  
COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by first class mail, postage prepaid, and e-mail transmission as indicated, upon the following persons this 7<sup>th</sup> day of September, 2012.

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