

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| AN INVESTIGATION OF THE ACCURACY OF |) | CASE NO. |
| KENTUCKY POWER COMPANY'S FUEL |) | 2016-00073 |
| ADJUSTMENT CLAUSE FILINGS |) | |

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due on or before April 11, 2016. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, 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.

Kentucky Power shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information,

Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Ranie K. Wohnhas (“Wohnhas Testimony”), page 8, line 15. Confirm that paper copies of fuel contracts are no longer included with the monthly fuel adjustment clause (“FAC”) backup file, but are filed separately via e-mail each month.

2. Refer to the Wohnhas Testimony, page 22, lines 8–16, which discusses errors found by Kentucky Power in the FAC back-up filings made between January 2012, and January 2013. Provide the corrected pages for the 13-month period.

3. Refer to the Wohnhas Testimony, Exhibit RKW-4.

a. Refer to pages 15–20 of 80. These pages reference Kentucky coal district numbers 3, 4, and 12. State whether these references are accurate. If they are accurate, state the location of these coal districts within the Commonwealth. If the pages contain errors, provide corrected pages.

b. Refer to page 49 of 80. Explain why the amount of tons purchased for the last supplier listed is a negative number.

c. Refer to pages 1–80 of 80. Throughout the exhibit, coal purchases from certain suppliers are allocated 50 percent to Kentucky District No. 6 and 50 percent to a West Virginia district. For example, on page 1 of 80, coal purchased under the Beech Fork Processing contract was equally divided between Kentucky District No. 6 and West Virginia District No. 12. Explain why a 50/50 allocation is made rather than using actual tons purchased from each district.

4. Prior to this proceeding, Kentucky Power used District No. 8 (for eastern Kentucky) and District No. 9 (for western Kentucky) to identify Kentucky coal districts in its FAC back-up filings.

a. Explain why Kentucky District No. 6 is now being used, and the location of this district within the Commonwealth.

b. Provide a map showing the current Mine Safety and Health Administration (“MSHA”) coal districts.

c. State when the district numbers were last updated by MSHA. If Kentucky Power did not begin using the new coal district numbering when the change was made, explain why it did not.


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Public Service Commission
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DATED **MAR 28 2016**

cc: Parties of Record

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