

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SECOND 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 May 9, 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 Kentucky Power's response to Commission Staff's First Request for Information ("Staff's First Request"), Item 3. Given that errors were found by Commission Staff and Kentucky Power in the updated pages filed with the Direct Testimony of Ranie K. Wohnhas, explain why the Commission should have confidence in the review process established by Kentucky Power to ensure that the monthly fuel adjustment clause backup filings are correct.

2. Refer to Kentucky Power's response to Staff's First Request, Item 4, which states that the previously used coal district number 8 "was a CSX coal rate district that is specific to the Big Sandy Coal Rate District."

a. Explain why Kentucky power originally utilized coal district identification based upon the CSX coal rate district numbers.

b. Confirm that the CSX coal rate district numbers are based upon the coal districts found in the Bituminous Coal Act of 1937, 18 U.S.C.A. § 828 *et seq.*, (repealed 1966). If this cannot be confirmed, provide supporting documentation that the coal districts originated from CSX.

c. Explain why Kentucky Power opted to stop using the previously used coal district numbers in favor of using the Mine Safety and Health Administration (“MSHA”) coal district numbers during the course of this proceeding rather than at an earlier time.

d. The response states that Kentucky Power “determined that the use of the MSHA district codes was a more meaningful representation of the coal district.” Explain how the MSHA numbers are more meaningful.



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cc: Parties of Record

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