

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

RIVERSIDE GENERATING COMPANY, L.L.C.	)	
	)	
COMPLAINANT	)	
V.	)	CASE NO.
	)	2017-00472
KENTUCKY POWER COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO  
RIVERSIDE GENERATING COMPANY, L.L.C.

Riverside Generating Company, L.L.C. ("Riverside"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of its responses to the following information, with a copy to all parties of record. The information requested herein is due on or before April 20, 2018. 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 the 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.

Riverside 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 Riverside fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall 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, Riverside 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 Anthony Hammond (“Hammond Testimony”), page 2, line 20 through page 3, line 4.

a. State the date that the Zelda generating station began service with Kentucky Power Company (“Kentucky Power”) and the rate schedule under which it was served.

b. State the date that the Foothills generating station began service with Kentucky Power and the rate schedule under which it was served.

c. Provide a copy of the bills received by Riverside from Kentucky Power for service to the Zelda and Foothills generating stations for service for the calendar year 2017 to date.

2. Refer to the Hammond Testimony, page 3. Confirm that Riverside has always been served under Kentucky Power's Tariff N.U.G.

3. Refer to the Hammond Testimony, page 4, lines 3–4. For each month of calendar year 2017, provide the amount of energy produced and the amount of energy consumed by the Zelda and Foothill generating stations.

4. Refer to the Hammond Testimony, page 4, lines 6–10. State when Riverside determined that it wanted to self-supply its station power in accordance with the terms of the PJM Interconnection, LLC's Open Access Transmission Tariff ("PJM OATT").

5. Refer to the Hammond Testimony, page 4, lines 14–18. Provide a copy of Section 1.7.10 of the PJM OATT.

6. Refer to the Hammond Testimony, page 5, lines 11–17. Provide copies of any written or electronic correspondence between Riverside and Kentucky Power regarding the request by Riverside to self-supply its own power needs remotely.

7. Refer to the Hammond Testimony, pages 6–7, regarding the physical location of the Zelda and Foothills generating stations. Provide an aerial photograph depicting the property lines of the two generating stations, the location of each of the generation station, and the transmission interconnection of each generation station to Kentucky Power's Baker Switchyard.

8. Refer to the Hammond Testimony at page 7. Provide a copy of the Payment in Lieu of Taxes Agreements referenced in lines 5–7.

9. Refer to the Hammond Testimony at page 7, lines 13-15 which state, "As a result, Riverside should be permitted to self-supply its Station Power in accordance

with the PJM OATT, and thus cease satisfying all of its electric needs with the retail purchases from Kentucky Power.”

a. If Riverside is permitted to self-supply its station power, explain why it needs to remain a customer of Kentucky Power.

b. State the amount Riverside would have been billed by Kentucky Power for service for calendar year 2017 if it had been permitted to self-supply its station power.

10. Refer to the Complaint filed by Riverside on December 13, 2017, page 3. Explain whether the revisions made by Kentucky Power to its Tariff N.U.G. as discussed in the footnote on this page is relevant to Riverside’s complaint. If yes, explain.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED MAR 30 2018

cc: Parties of Record

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