

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR: (1) APPROVAL TO)	
EXPAND ITS TARGETED ENERGY EFFICIENCY)	
PROGRAM; (2) APPROVAL OF A HOME)	
ENERGY IMPROVEMENT PROGRAM AND A)	
COMMERCIAL ENERGY SOLUTIONS)	
PROGRAM; (3) AUTHORITY TO RECOVER)	CASE NO.
COSTS AND NET LOST REVENUES, AND TO)	2024-00115
RECEIVE INCENTIVES ASSOCIATED WITH THE)	
IMPLEMENTATION OF ITS DEMAND-SIDE)	
MANAGEMENT/ENERGY EFFICIENCY)	
PROGRAMS; (4) APPROVAL OF REVISED)	
TARIFF D.S.M.C.; (5) ACCEPTANCE OF ITS)	
ANNUAL DSM STATUS REPORT; AND (6) ALL)	
OTHER REQUIRED APPROVALS AND RELIEF)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than January 17, 2025. The Commission directs Kentucky Power to the Commission's July 22, 2021, Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Each response shall include the question to which the response is made and 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.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 shall be given to copied and scanned 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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. Provide a detailed cost breakdown of each of the proposed demand-side management (DSM) programs, including the expansion of the Targeted Energy Efficiency (TEE) program. Include in the response how Kentucky Power estimated the administrative, marketing, and incentive costs along with any cost justification sheets.

2. Provide an estimated cost of a standard Evaluation, Measurement, and Verification (EM&V) study.

3. Provide a copy of the 2014, or last conducted, EM&V study.

4. Provide the contract and cost estimates requested by TRC Companies to manage the Home Energy Improvement Program and the Commercial Energy Solutions Program.

a. If a contract has not been finalized, state the status of that contract negotiations.

b. Describe TRC Companies involvement thus far in the development of the program and how it has been compensated.

5. Explain why Kentucky Power did not propose the DSM programs as pilot programs.

6. For the years beginning in January 1, 2023, through December 31, 2024, provide graphs, for each month, of average customer energy usage by month for customers served under only the Tariff Residential Service and Tariff Residential Service who are also enrolled in Low Income Heating Energy Assistance Program (LIHEAP) in which the x axis of the graph is the months of the year and y axis is the kWh used. Provide the statistical information to support the graphs in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

7. Provide the low-income threshold for a Kentucky Power customer to be able to qualify for the TEE program.
8. Provide a more detailed explanation and cost justification for the increases in the educational and application fee for the TEE program?
9. Confirm that Kentucky Power budgets for anticipated costs in its demand-side management rider and then expends those funds once the Community Action Agency's (CAA) incur the costs and then seek recovery of those costs from Kentucky Power. If confirmed, provide the most recent invoice that Kentucky Power receives from the CAA. If not confirmed, explain how the process of cost recovery works from the CAA's.
10. Explain how Kentucky Power modeled and anticipated all costs associated with its newly proposed DSM programs. Include in the response any inputs or historical data relied upon in the modeling.

 *Linda C. Bridwell* *pp*

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DATED DEC 23 2024

cc: Parties of Record

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