

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF KENTUCKY)	CASE NO.
POWER COMPANY TO REVISE ITS)	2024-00305
INDUSTRIAL GENERAL SERVICE TARIFF)	

COMMISSION STAFF'S FIRST 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 on October 31, 2024. 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.

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

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).

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. Refer to the proposed tariff, P.S.C. KY. NO. 13, Original Sheet No. 8–3.
 - a. Explain how Kentucky Power decided to set the applicability cutoff for the new provisions at 150 MW.
 - b. Explain whether existing customers that expand their operations to a level above a contract demand of 150 MW will be subject to the new provisions once their contract demand exceeds 150 MW.

2. Refer to the proposed tariff, P.S.C. KY. NO. 13, Original Sheet No. 8–3.
 - a. Explain the circumstances under which Kentucky Power would agree to allow the customer to reduce the contract capacity with less than five years' notice.
 - b. Explain the circumstances under which Kentucky Power would agree to allow the customer to reduce the maximum contract capacity by more than twenty percent.
 - c. Explain whether the amount of collateral would be updated if the recomputed value was less than the current amount held by 10 percent or more.
3. Refer to the proposed tariff, P.S.C. KY. NO. 13, Original Sheet No. 8–3.
 - a. Explain whether the proposed provisions would be applicable to customers where Kentucky Power did not have substantial transmission and generation infrastructure investments in order to serve.
 - b. Explain how Kentucky Power determined that a 20-year term is necessary to recover transmission and generation infrastructure investments.
 - c. Explain how Kentucky Power determined that a one-time payment equal to five years of minimum billing is necessary to recover transmission and generation infrastructure investments.
 - d. Explain how Kentucky Power determined that collateral equal to 24 times the customer's previous maximum monthly non-fuel bill is necessary to recover transmission and generation infrastructure investments.
4. Refer to the proposed tariff, P.S.C. KY. NO. 13, Original Sheet No. 8–3.
 - a. Explain whether the billing demand would be the maximum demand created during the billing month if greater than the customer's on-peak contract capacity

or the customer's highest previously established monthly billing demand during the past 11 months.

b. Explain how Kentucky Power determined that the minimum billing demand should be 90 percent of the greater of the customer's on-peak contract capacity, the customer's highest previously established monthly billing demand during the past 11 months or, the customer's maximum demand created during the billing month.

5. Provide any studies or supporting documentation Kentucky Power used to make the determination that 150 MW was the appropriate minimum contract demand for the proposed conditions of service.

6. Provide any studies or supporting documentation that five-year notice for termination of service was reasonable or mathematically necessary for Kentucky Power to recover its costs.



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DATED OCT 18 2024

cc: Parties of Record

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