## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) A CERTIFICATE OF	)	
PUBLIC CONVENIENCE AND NECESSITY	)	
AUTHORIZING THE DEPLOYMENT OF	)	CASE NO.
ADVANCED METERING INFRASTRUCTURE; (2)	)	2024-00344
REQUEST FOR ACCOUNTING TREATMENT;	)	
AND (3) ALL OTHER NECESSARY WAIVERS,	)	
APPROVALS, AND RELIEF	)	

## COMMISSION STAFF'S SECOND 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 January 10, 2025. The Commission directs Kentucky Power to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> 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

<sup>&</sup>lt;sup>1</sup> 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).

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.

- Refer to Kentucky Power's response to Staff's First Request for Information (Staff's First Request), Item 5.
- a. Explain whether the response means that if Kentucky Power receives and places into service a refurbished meter that is ten years into its 15-year life span, the meter will be retired in five years.

- b. Explain at what point a meter reaching the end of its useful life will not be refurbished due to the cost of refurbishment.
  - 2. Refer to Kentucky Power's response to Staff's First Request, Item 7(c).
- a. Explain how many net metering customers Kentucky Power currently has in its service territory.
- b. Confirm whether any of Kentucky Power's net metering customers will need new AMI meters installed, a second meter, or both, if the Commission were to approve Kentucky Power's application. If confirmed, identify the number of net metering customers effected and describe Kentucky Power's method of identifying those customers.
- c. Explain whether Kentucky Power or its impacted net metering customer would be responsible for the costs of purchasing and installing the second meter.
- d. Explain whether Kentucky Power anticipates large growth in Electric Vehicle ownership, in calendar years 2025-2030, in its service territory. If so, provide any anticipated load growth data that would justify the load increase.
- e. Explain what Kentucky Power means by "revenue grade load disaggregation".
- 3. Provide the number of customers, for each customer class, with online accounts. Include in the response whether the accounts are email, phone, or another category of online account by both number and percentage of online account customers in relation to the total amount of customers.

- 4. Refer to the informal conference held on December 17, 2024. Provide the threshold percentage Kentucky Power will use for a customer to receive higher than normal bill notification.
- 5. Refer to the Direct Testimony of Lerah Kahn (Kahn Direct Testimony), pages 21-22.
- a. Provide a breakdown of the cost savings for each deviation requested. If Kentucky Power cannot provide a monetary value, provide any information related to savings.
- b. Provide a specific timeline for each deviation requested, including but not limited to a timeline related to meters replaced and older meters still in service. Include in the timeline when testing would cease, when testing would begin as well as a description of the location related to the specified time.
- c. As to administrative regulation 807 KAR 5:041, reconcile the proposed deployment plan and the current meter testing schedule. In the response, explain how the deployment plan will address meters that will not be tested within the 8 year period as a result of the cessation of testing.
- d. Confirm that Kentucky Power's deviation request is for the full fouryear AMI deployment period. If not confirmed, explain.
- e. Confirm that Kentucky Power is requesting a permanent deviation from testing meters every two years once AMI deployment is complete. If not confirmed, explain.
- f. Describe who will inspect and ensure meter replacements meet the appropriate standards.

6. Refer to Case No. 2024-00017,<sup>2</sup> as discussed at the informal conference held on December 17, 2024. Provide the remaining amount of approved indebtedness

not yet utilized by Kentucky Power.

7. Refer to the informal conference held on December 17, 2024. Explain if a

customer can request a physical copy of the AMI data through the customer service

hotline if the customer is unable to access the data through the online portal.

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Linda C. Bridwell, PE Executive Director

**Public Service Commission** 

P.O. Box 615

Frankfort, KY 40602

DATED \_\_\_\_\_DEC 30 2024

cc: Parties of Record

<sup>&</sup>lt;sup>2</sup> Case No. 2024-00017 Electronic Application of Kentucky Power Company for Authority Pursuant to KRS 278.300 to Issue and Sell Promissory Notes of One or More Series and for Other Authorizations (Ky. PSC Apr. 2, 2024).

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