COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY TO WITHDRAW ITS TARIFF RTP PENDING SUBMISSION BY THE COMPANY AND APPROVAL BY THE COMMISSION OF A NEW REAL-TIME PRICING TARIFF

CASE NO. 2012-00226

COMMISSION STAFF’S THIRD REQUEST FOR INFORMATION TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before September 21, 2012. Responses to requests for information 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.

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, 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.

1. Refer to Kentucky Power’s Supplemental Response to Commission Staff’s Second Set of Data Requests Item No. 5, filed August 20, 2012. Item 5.d., requested the following: “In reviewing the Tariff RTP customer usage patterns, explain whether those customers have shifted any portion of their load from higher-priced periods to lower-priced periods or whether those customers have added any new load in low price periods.” Kentucky Power’s response at page 3 stated the following:

The July 2012 data suggests that none of the ten RTP customers shifted any portion of their load from higher-priced periods to lower-periods. The one month of data, however, is not a sufficient basis for the Company to resolve the question conclusively. Kentucky Power will continue to analyze future usage data and supplement this response as appropriate.

Kentucky Power has concluded that none of the RTP customers added new load in lower-priced periods.

a. How many months of data does Kentucky Power believe are necessary to determine whether any customers have shifted any portion of their load from higher-priced periods to lower-priced periods?
b. With respect to the customers receiving service under Tariff RTP in the month of August 2012, is Kentucky Power aware of any load being shifted or any new load being added in the lower-priced periods?

2. Refer to the Kentucky Power’s Response to Commission Staff’s Second Set of Data Requests, filed August 10, 2012, Item 6.b. It states the following:

   The ten customers currently taking service under Tariff R.T.P. met the minimum qualifications for contracting to take service under the tariff and were allowed to enroll. The four qualifications are necessary but not sufficient conditions for participation under Tariff R.T.P. Also required, as set out in the first sentence of the tariff excerpt, is that once enrolled the customer utilize the tariff to "manage their electric costs by shifting load from higher cost to lower cost pricing periods or by adding new load during lower price periods." This cannot be determined until the customer begins operating under the Tariff and thus the ten customers were allowed to enroll.

Explain how long it will take for Kentucky Power to determine whether the RTP customers currently taking service under Tariff R.T.P.:

   a. Have shifted any load from the high-priced period to a lower-priced period; and

   b. Have added any new load during the lower-priced time period.

If the response is different from the response in Item 1 above, explain.

cc: Parties of Record
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