

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

APPLICATION OF AEP KENTUCKY TRANSMISSION)
COMPANY, INC. FOR A CERTIFICATE OF PUBLIC) CASE NO.
CONVENIENCE AND NECESSITY PURSUANT TO) 2011-00042
KRS 278.020 TO PROVIDE WHOLESALE)
TRANSMISSION SERVICE IN THE COMMONWEALTH)

PUBLIC SERVICE
COMMISSION

ATTORNEY GENERAL'S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to AEP Kentucky Transmission Company, Inc. [hereinafter referred to as "AEP"] to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for AEP with an electronic version of these questions, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the

original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts

(including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.


(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,

JACK CONWAY
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

Hon. Mark R. Overstreet
Stites & Harbison
P. O. Box 634
Frankfort, KY 40602-0634

Hon. David F. Boehm
Boehm, Kurtz & Lowry
36 E. 7th St.
Ste. 1510
Cincinnati, Ohio 45202

this 18th day of March, 2011



Assistant Attorney General

AEP KENTUCKY TRANSMISSION COMPANY, INC.

Case No. 2011-00042

Attorney General's Initial Data Requests

1. Please provide copies of any and all original studies indicating how the new transmission subsidiary ("Transco") would impact Kentucky Power's ratepayers from a monetary perspective (i.e., how much more they can expect to pay) in the event the Kentucky PSC should approve the petition in the instant matter.
 - a. Provide a break down by ratepayer class regarding the monetary impact.
 - b. To the extent possible, illustrate the financial impact to Kentucky Power's ratepayers over:
 - (i) One year;
 - (ii) Five years;
 - (iii) Ten years;
 - (iv) Fifteen years; and
 - (v) Twenty years.
 - c. Provide copies of any and all correspondence between Kentucky Power officials and its parent, American Electric Power, and its other subsidiaries, regarding the instant matter.
2. Does AEP agree that if the Kentucky PSC grants AEP's petition in the instant matter, that the Kentucky PSC would lose jurisdiction regarding any transmission projects which the contemplated Transco would assume? If AEP disagrees, state in complete detail why the company disagrees, and provide all documentation necessary to support the company's assertion.
3. In the event the Kentucky PSC grants AEP's petition in the instant matter, confirm that FERC would have sole jurisdiction and authority over approval of any transmission projects the new Transco would assume.
4. Confirm that FERC awards a rate of return on transmission projects, together with an incentive-based rate of return.
5. Provide copies of all analyses analyzing and / or forecasting the rates of return AEP can, could or would expect if FERC becomes the sole regulatory authority reviewing transmission projects which the new Transco would assume.
 - a. To the extent possible, illustrate the financial impact to AEP over:
 - (i) One year;
 - (ii) Five years;
 - (iii) Ten years;
 - (iv) Fifteen years; and

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- (v) Twenty years.
 - b. Provide copies of all analyses analyzing and / or forecasting the rates of return AEP can, could or would expect if the Kentucky PSC continues to retain the degree of authority that it currently exercises with regard to Kentucky-based transmission projects and rates of return.
6. Provide copies of all analyses analyzing and/or forecasting the monetary benefit or detriment AEP could or is likely to experience in all states in which it is filing for permission to create the Transco contemplated in the instant petition.
- a. To the extent possible, illustrate the financial impact AEP will experience in all such states over:
 - (i) One year;
 - (ii) Five years;
 - (iii) Ten years;
 - (iv) Fifteen years; and
 - (v) Twenty years.