

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In The Matter Of:

APPLICATION OF AEP KENTUCKY)
TRANSMISSION COMPANY, INC.)
FOR A CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY TO)
OPERATE AS A TRANSMISSION ONLY)
PUBLIC UTILITY)

Case No. 2011-00042

**MOTION BY
AEP KENTUCKY TRANSMISSION COMPANY, INC.
FOR EXTENSION OF TIME TO FILE RESPONSES TO DATA REQUESTS AND FOR
LEAVE TO FILE THE DIRECT TESTIMONY OF JULIE M. CANNELL**

AEP Kentucky Transmission, Inc. (“KY Transco”) moves the Commission for an extension of time until May 16, 2012 in which to file its Responses to the Data Requests propounded on March 22, 2012. KY Transco also requests leave to file the direct testimony of Julie M. Cannell on May 16, 2012. In support of its motion KY Transco states:

1. A hearing was conducted in this matter on October 19, 2011. Thereafter, KY Transco filed its post-hearing brief on November 18, 2011.
2. On March 22, 2012 the Commission issued an order propounding Data Requests and providing that a hearing will be scheduled for a later date to allow KY Transco “an opportunity to present its consultant [Julie M. Cannell] for purposes of cross-examination.”¹ The Order provides that Kentucky Power is to provide its Responses to the Data Requests by April 11, 2012.²

¹ Order, *In the Matter of: Application of AEP Transmission Company, Inc. For A Certificate Of Public Convenience And Necessity Pursuant To KRS 278.020 To Provide Wholesale Transmission Service In The Commonwealth*, Case No. 2011-00042 at 2-3 (Ky. P.S.C. March 22, 2012).

² *Id.* at 4.

3. KY Transco welcomes the opportunity to answer the Data Requests and to offer Ms. Cannell for cross-examination.

4. The first twelve data requests address Ms. Cannell's white paper, "AEP Transco: The Investor's Perspective," and her methodology in researching and developing it.

5. Ms. Cannell did not file testimony in this proceeding. Rather, her unsworn March, 2010 white paper was attached as Exhibit JRB-2 to Mr. Boeteler's testimony. A more complete record can be developed, and Ms. Cannell's cross-examination can be more efficiently undertaken, if she files direct testimony at the time the Data Request Responses are filed.

6. Ms. Cannell is traveling and will not return to her office until April 13, 2012.

7. Kentucky Power Company's environmental compliance application is pending before the Commission.³ A hearing on the application is scheduled to begin on April 30, 2012. Because many of the same persons, including legal counsel, are involved in both the environmental compliance application and this proceeding, KY Transco may be unable to meet the April 11, 2012 deadline for KY Transco to file the Data Request Responses.

8. The requested extension will permit KY Transco to prepare the Data Request Responses in an orderly and efficient manner, including working with Ms. Cannell to prepare the Responses to the Data Requests 1-12 following her return to her office on April 13, 2012, and to prepare and file Ms. Cannell's direct testimony.

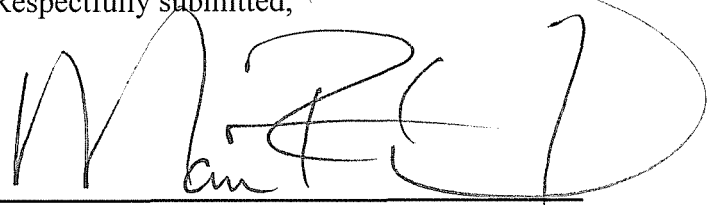
9. This motion is not made for purposes of delay and will not prejudice any party to this proceeding.

³ *In The Matter Of: Application Of Kentucky Power Company For Approval Of Its 2011 Environmental Compliance Plan, For Approval Of Its Amended Environmental Cost Recovery Surcharge Tariff, And For The Granting Of A Certificate Of Public Convenience And Necessity For The Construction And Acquisition Of Related Facilities, Case No. 2011-00401.*

Wherefore, AEP Kentucky Transmission Company, Inc. respectfully requests that the Commission enter an Order:

- (a) Extending until May 16, 2012 the date for it to file Responses to the March 22, 2012 Data Requests;
- (b) Granting it leave to file the Direct Testimony of Julie M. Cannell; and
- (c) Granting it such further relief as to which it may appear entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark R. Overstreet", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

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COUNSEL FOR AEP KENTUCKY
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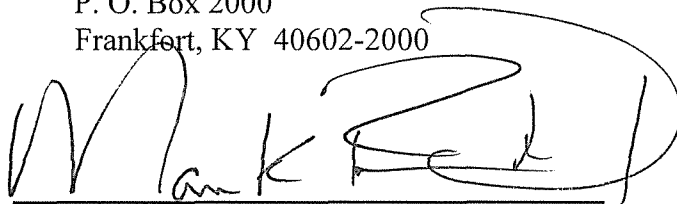
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Filing was served by first class mail, postage prepaid, upon the following:

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this 30th day of March, 2012.

A handwritten signature in black ink, appearing to read "Mark R. Overstreet", written over a horizontal line.

Mark R. Overstreet