

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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

RECEIVED

MAR 23 2012

**PUBLIC SERVICE
COMMISSION**

**Kentucky Power Company Data Requests To Tom Vierheller,
Beverly May, And The Sierra Club**

Kentucky Power Company propounds the following Data Requests to Tom Vierheller,
Beverly May, And The Sierra Club:

Instructions And Definitions

Instructions

1. Wherever the response to a data request consists of a statement that the requested information is already available to the Company, provide a detailed citation to the document that contains the information necessary to locate the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s), and any applicable URL.

2. In the event that any document referred to in response to any request for

information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

Definitions

Unless otherwise specified, “you,” “your,” or “Sierra Club” refers to Tom Vierheller, Beverly May, the Sierra Club, Inc., its 64 chapters, and its affiliates, employees, and authorized agents, or any one or combination of the identified persons or entities included within this definition of Sierra Club.

“AEP” means American Electric Power Company, Inc.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these interrogatories and requests for production of documents any information which might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“Chesapeake” means Chesapeake Energy Corporation, its affiliates, subsidiaries, officers, and directors.

“Communication” means any transmission or exchange of information between two or more persons or entities, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody

or control of the Companies regardless of where located, or (2) produced or generated by, known to or seen by the Companies, but now in their possession, custody or control, regardless of where located whether or still in existence.

Such “documents” shall include, but are not limited to, applications, permits, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

For purposes of the production of “documents,” the term shall include copies of all

documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the persons or entities referenced;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

With respect to a communication, to state the subject matter of the communication in sufficient detail to permit an understanding of what matters were communicated, the date of the communication, persons present during the communication, or who made or sent the communication received

“KPC,” “Kentucky Power,” or “Company” means Kentucky Power Company.

“Relating to” or “concerning” means and includes pertaining to, referring to, or having as a subject matter, directly or indirectly, expressly or implied, the subject matter of the specific request.

Privilege or Confidentiality

1. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any interrogatory or request for production, describe the basis for your claim of privilege in sufficient

detail so as to permit the Commission to adjudicate the validity of the claim if called upon to do so. With respect to documents for which a privilege is claimed, produce a “privilege log” that identifies the author, recipient, date and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable the Company or the Commission to evaluate the validity of such claims.

2. To the extent that you can legitimately claim that any interrogatory response or responsive document is entitled to confidentiality, the Company is willing to enter into a confidentiality agreement that would protect such response or document from public disclosure.

Time

Unless otherwise provided, the applicable time period for each of these requests for information is January 1, 2009 to the present.

Continuing Nature of Requests

These requests are continuing in nature and the responses shall be promptly and periodically supplemented, amended, or modified so as to remain at all times complete and accurate.

Data Requests

1. Please identify all terms, conditions, requirements, agreements, or understandings between Sierra Club and Chesapeake regarding the approximately \$26 million in contributions made by Chesapeake to the Sierra Club beginning in 2007 and identified by Mr. Michael Brune, Executive Director of the Sierra Club, in the February 2, 2012 blog post that may be found at the following URL:

<http://sierraclub.typepad.com/michaelbrune/2012/02/the-sierra-club-and-natural-gas.html> (“Blog Post.”)

- a. Please produce any documents in the possession or control of the Sierra Club relating to the contributions referenced by Mr. Brune in the Blog Post;
- b. To the extent not otherwise required to be produced in response to data request 1(a), please produce any documents in the possession or control of the Sierra Club relating to or evidencing the terms, conditions, requirements, agreements, or understandings between Sierra Club and Chesapeake regarding the contributions referenced by Mr. Brune in the Blog Post.

2. Please identify any communications between Sierra Club and Chesapeake regarding the subject matter of this proceeding, including, but not limited to, the application, testimony, data requests, data request responses, or other filings made by any party in this proceeding.

- a. Please produce any documents in the possession or control of the Sierra Club relating to or evidencing the communications required to be identified in this data request.

3. Please identify any contributions to Sierra Club totaling \$100,000 or more in the aggregate from any natural gas exploration, production, transport, pipeline, sales, or distribution utility, any trade association related to such entities, or any executive officers or directors of such entities or trade associations during the period January 1, 2007 to the date the response to this data request is filed. For each such contribution please provide the following information:

- a. The identity of the person(s) or entit(ies) making the contribution;
- b. The amount of the contribution;

c. Any terms, conditions, requirements, agreements, or understandings between the Sierra Club and the donor of the gift(s) that are the subject of this data request.

4. Please refer to the Sierra Club's Beyond Coal initiative or program that is referenced at the following URL: <http://www.beyondcoal.org/> Please provide all documents discussing, describing, or evidencing the goals and objectives of Sierra Club's Beyond Coal initiative or program.

5. Please produce all documents within the possession or control of the Sierra Club (subject to any legitimate claim of attorney-client privilege or work product protection) relating or referring to Big Sandy Unit 1 or Big Sandy Unit 2 or the subject matter of these proceedings.

6. Please refer to page 13, lines 5-7 of Mr. Hornby's testimony.

a. Please provide the bill number of the legislation proposing to establish a Renewable and Efficiency Portfolio Standard that is referenced in the identified testimony.

b. Has the identified legislation been enacted into law?

c. Are you aware of any bills introduced into prior sessions of the Kentucky General Assembly that would have established a state renewable or energy efficiency portfolio standard? If so, please identify any such bills and indicate whether they were enacted into law.

7. Please refer to page 15 and Table 1 on page 17 of Dr. Fisher's testimony. Please provide all spreadsheets in electronic format—with all calculations operational and formulas intact and unprotected—that were utilized to determine the "Adjusted Off System Sales" value in

Table 1. Also, please provide the specific Company source (i.e., filename and cell references) of the data from which it was derived.

8. Please refer to page 41, and Figure 5 on page 42 of Dr. Fisher's testimony. Provide all spreadsheets in electronic format—with all calculations operational and formulas intact and unprotected—that were utilized to determine the Figure 5 chart data points. Also, please provide the specific Company source (i.e., filename and cell references) of the data from which it was derived.

9. Please refer to page 59 of Dr. Fisher's direct testimony. Provide in electronic format, with all calculations and formulas intact, unprotected, and operational, all calculations and source derivations for the commodity price correlations reflected in Table 9 under the "Correlations derived from Sierra DR 1-34b" heading.

10. Please refer to page 64 of Dr. Fisher's direct testimony. Please provide all support for, and demonstrate in electronic format, with all calculations operational and formulas intact and unprotected, the derivation of the commodity price correlations reflected in Table 10 under the "Synapse" heading

11. Please refer to page 18, line 10 and Exhibit JIF-4 of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Exhibit JIF-4.

12. Please refer to page 23, lines 1-8, Figure 3, and Exhibit JIF-6A of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Figure 3 and Exhibit JIF-6A.

13. Please refer to page 24, line 7 and Exhibit JIF-6B of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Exhibit JIF-6B.

14. Please refer to page 24, lines 13-16 of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to develop the “Synapse Strategist Compilation Workbook”.

15. Please refer to page 25 lines 1-5, Table 2, and Exhibit JIF-3B of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and protected, used to prepare Table 2 and Exhibit JIF-3B.

16. Please refer to page 26, lines 1-2, Table 3, and Exhibit JIF-3C of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Table 3 and Exhibit JIF-3C.

17. Please refer to page 30, lines 4-6 of the Direct testimony of Dr. Fisher.

a. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to develop these scenarios where fuel prices are not correlated.

b. Please provide the Strategist files in FSV format after run execution for each of these fuel price sensitivity scenarios where fuel prices are not correlated.

c. Please provide in electronic format, with all calculations operational and formulas intact and unprotected, the results of the scenarios referred to in subparts (a) and (b) of this data request.

18. Please refer to page 35, lines 6-9 of the direct Testimony of Dr. Fisher. Please reconcile Dr. Fisher's statement that "For the purposes of this case Ms. Wilson tested three of the Options... using the Synapse Low CO2 Price Forecast" with Ms. Wilson's testimony at page 10, lines 9-11 indicating she tested all five options.

19. Please refer to page 10, lines 9-11 of Ms. Wilson's testimony.

a. Please provide the Strategist files in FSV format after run execution for each of the five options tested by Ms. Wilson as described in her testimony

b. Please provide a detailed description of each change made to the Company's Strategist databases in performing the Synapse Low CO2 Price Forecast Strategist runs described by Ms. Wilson in her testimony on page 10. The requested description of each change should include the location in the Strategist database where each change was made (e.g. "Input.System.Effluent.Individual Variables.Cost Rate") and a detailed listing in electronic format of the input changes (i.e. values) used in these runs.

c. Please provide the forecast of other commodity prices (e.g. gas prices, PJM market energy prices, AEP existing fleet delivered coal prices, etc.) associated with or used to generate the Synapse Low CO2 Price Forecast referred to by Ms. Wilson in her testimony on page 10. Provide all analyses and research reviewed and/or prepared by Synapse supporting the development of other commodity price forecasts associated with the Synapse Low CO2 Price Forecast.

20. Please refer to page 36, lines 1-2, Table 4 and Exhibit JIF-3D of the direct testimony of Dr. Fischer. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Table 4 and Exhibit JIF-3D.

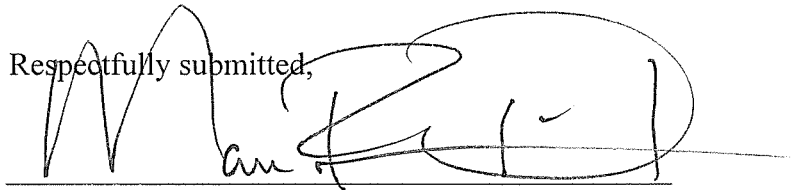
21. Please refer to page 36, lines 8-10, Table 5 and Exhibit JIF-3E of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Table 5 and Exhibit JIF-3E.

22. Please refer to page 38, lines 1-2, Table 6, and also Exhibit JIF-3F of the direct testimony of Dr. Fisher. Please provide all assumptions and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, used to prepare Table 6 and Exhibit JIF-3F.

23. Please refer to page 5, lines 6-10 of the direct testimony of Ms. Wilson. Please provide all documents, including any notes, recordings, and correspondence, evidencing, memorializing, or related to the February 24, 2012 phone conversation referred to by Ms. Wilson in her testimony.

24. Please refer to page 20, lines 8-10 of the direct Testimony of Dr. Fisher. Please provide the assumptions, calculations, and workbooks, in electronic format with all calculations operational and formulas intact and unprotected, that support or were used to develop Dr. Fisher's testimony that the gap between the two lines (referenced in Figure 2 (Exhibit JIF-5)) "suggests a capital cost difference of nearly \$1 billion (2011\$)" between the Big Sandy retrofit alternative (Option #1) and the CC replacement alternative (Option #2).

Respectfully submitted,



Mark R. Overstreet
R. Benjamin Crittenden
STITES & HARBISON, PLLC
421 West Main Street
P.O. Box 634
Frankfort, KY 40602-0634
Telephone: (502) 223-3477
COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by e-mail and first class mail upon the following parties of record this the 23rd day of March, 2012.

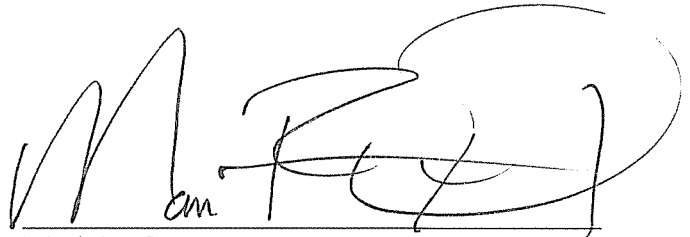
Michael L. Kurtz
Kurt J. Boehm
Boehm, Kurtz & Lowry
Suite 1510
36 East Seventh Street
Cincinnati, OH 45202

Joe F. Childers
Joe F. Childers & Associates
300 The Lexington Building
201 West Short Street
Lexington, KY 40507

Jennifer Black Hans
Dennis G. Howard II
Lawrence W. Cook
Assistant Attorney General
Office for Rate Intervention
P.O. Box 2000
Frankfort, KY 40602-2000

Kristin Henry
Sierra Club
85 Second Street
San Francisco, CA 94105

Shannon Fisk
235 Rector St.
Philadelphia, PA 19128



Mark R. Overstreet