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PUBLIC SERVICE
COMMISSION

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July 17, 2013

HAND DELIVERED

Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

R. Benjamin Crittenden
(502) 209-1216
(502) 223-4388 FAX
rcrittenden@stites.com

Re: Case No. 2012-00224

Dear Mr. Derouen:

Please find enclosed and accept for filing the original and ten copies of Kentucky Power Company's responses to the supplemental data requests propounded by the Commission Staff during the informal conference conducted on June 26, 2013..

Copies of the responses are being served on counsel for Grayson along with a copy of this letter.

Very truly yours,

STITES & HARBISON PLLC


R. Benjamin Crittenden

cc: W. Jeffrey Scott

COMMONWEALTH OF KENTUCKY
BEFORE THE
PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF

**PETITION AND COMPLAINT OF KENTUCKY POWER)
COMPANY FOR A DECLARATION OF ITS)
RIGHT PURSUANT TO KRS 278.018(1) TO SERVE)
THOSE PORTIONS OF THE SAND GAP ESTATES) CASE NO. 2012-00224
GREENUP COUNTY, KENTUCKY LYING WITHIN)
ITS CERTIFIED TERRITORY IN LIEU OF)
GRAYSON RURAL ELECTRIC COOPERATIVE)
CORPORATION)**

**KENTUCKY POWER COMPANY RESPONSES TO COMMISSION STAFF'S
JUNE 26, 2013 INFORMAL CONFERENCE DATA REQUESTS**

July 17, 2013

VERIFICATION

The undersigned, Delinda K. Borden, being duly sworn, deposes and says she is the Manager, Customer and Distribution Services for the Ashland District for Kentucky Power Company, that she has personal knowledge of the matters set forth in the forgoing responses for which she is the identified witness and that the information contained therein is true and correct to the best of her information, knowledge and belief.

Delinda K. Borden

Insert Name

COMMONWEALTH OF KENTUCKY)

) Case No. 2012-00224

COUNTY OF BOYD)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Delinda K. Borden this the 12 day of July 2013.

Earl Brent Parsons

Notary Public # 439955

My Commission Expires: 28 MARCH 2015



Kentucky Power Company

REQUEST

Please provide a description of how Kentucky Power Company intends to run the lines into Sand Gap Estates to serve the customers at issue (and any additional customers that might build in its service territory).

RESPONSE

Kentucky Power would need to construct approximately 3,722 ft of new #2Al single phase primary line to serve both customers in the Sand Gap Estates subdivision. The new line extension would follow the existing Sand Gap Road, in a southwesterly direction, from our existing pole 38830065D20035, which is located at the Sand Gap Church. The first customer, Porter at 414 Sand Gap Road, would be served at approximately 1,807 feet from the takeoff pole to Grayson RECC's pole # 3019-28. Beyond GRECC pole #3019-28 we would install 2 spans of #2Al single phase primary to the corner of Lot 15 and to Lot 16 approximately 515 feet. From GRECC's pole #3019-28 we would span approximately 140 feet southeast to the corner of Lot 37. At this point we would construct 1,260 ft. of #2Al single phase line along Olivia Blvd. Southwest to GRECC's pole which serves Lot #28 at 397 Olivia Blvd.

WITNESS: Delinda K Borden



Kentucky Power Company

REQUEST

Please provide an estimate of the costs Kentucky Power Company will incur and whether it will seek to recover those costs from the customers at issue.

RESPONSE

Estimated cost to install the facilities is \$32,601. We will not seek recovery from the customers of Sand Gap Estates.

WITNESS: Delinda K Borden



Kentucky Power Company

REQUEST

Please provide a listing of any facilities Kentucky Power Company would be required to purchase from Grayson to serve the customers at issue.

RESPONSE

Purchase Pole and underground riser assembly and underground conductor serving 414 Sand Gap road. GRECC would be required to remove their overhead primary and neutral conductors, transformers, and attachments, one down guy assembly, anchor and one Dusk-to-dawn light.

Purchase Pole and underground riser assembly and underground conductor serving 397 Olivia Blvd. GRECC would be required to remove their overhead primary and neutral conductors, transformers, and attachments, one down guy assembly, anchor and one Dusk-to-dawn light.

WITNESS: Delinda K Borden



Kentucky Power Company

REQUEST

Please provide information regarding the time line of when Kentucky Power Company raised the boundary dispute issue with Grayson.

RESPONSE

Kentucky Power previously addressed this in its response to Grayson's data request item #7; however, the following represents the time line concerning the boundary dispute with Grayson:

- Ms. Munsey wrote a letter to GRECC's President & CEO Carol Fraley dated October 21, 2011.
- Ms. Munsey, Everett Phillips, Delinda Borden, and Steve Martin attended a meeting with Ms. Fraley, Ronnie Evans, Scott Speaks and 2 other representatives of GRECC on November 8, 2011.
- Ms. Munsey wrote a second letter to Carol Fraley dated December 5, 2011.
- Communications between counsel for Kentucky Power and GRECC in the fall of 2012.

WITNESS: Delinda K Borden



Kentucky Power Company

REQUEST

Please superimpose the sketch introduced as Exhibit DKB-2 to the supplemental testimony of Company witness Borden onto Map 1 of the response to KPSC 2-1.

RESPONSE

The sketch introduced as Exhibit DKB-2 to the supplemental testimony of Company Witness Borden has been superimposed onto the requested map and is attached as Map 1 of 1.

WITNESS: Richard L. Howerton

Case No. 2012-224

CONTAINS

LARGE OR OVERSIZED

MAP(S)

RECEIVED ON: 07-17-13