

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

RECEIVED

JUL 30 2012

PUBLIC SERVICE
COMMISSION

Via Overnight Mail

July 27, 2012

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

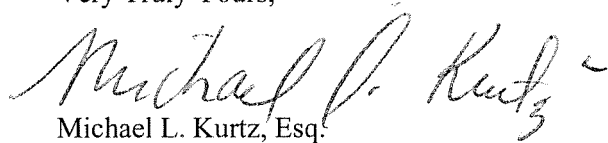
Re: Case No. 2012-00226

Dear Mr. Derouen:

Please find enclosed the original and ten (10) copies of the KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC's SUPPLEMENTAL SET OF DATA REQUESTS TO KENTUCKY POWER COMPANY for filing in the above-referenced docket.

By copy of this letter, all parties listed on the Certificate of Service have been served. Please place this document of file.

Very Truly Yours,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

BOEHM, KURTZ & LOWRY

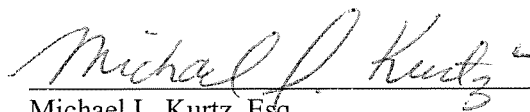
MLKkew

Attachment

cc: Certificate of Service
Faith Burns, Esq.
Richard Raff, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy via electronic mail (when available) and regular U.S. Mail to all parties on this 27th day of July, 2012.

A handwritten signature in cursive script, reading "Michael L. Kurtz", is written over a horizontal line.

Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

MARK R OVERSTREET, ESQ.
STITES & HARBISON
421 WEST MAIN STREET
P. O. BOX 634
FRANKFORT, KENTUCKY 40602-0634

DENNIS G. HOWARD, II. ESQ.
ASSISTANT ATTORNEY GENERAL'S OFFICE
1024 CAPITAL CENTER DRIVE, STE 200
FRANKFORT, KENTUCKY 40601-8204

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF: THE APPLICATION OF :
KENTUCKY POWER COMPANY TO WITHDRAW ITS :
TARIFF RTP PENDING SUBMISSION BY THE : Case No. 2012-00226
COMPANY AND APPROVAL BY THE COMMISSION :
OF A NEW REAL-TIME PRICING TARIFF :

SUPPLEMENTAL DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO KENTUCKY POWER COMPANY

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody M. Kyler, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513.421.2255 Fax: 513.421.2764
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkyler@BKLawfirm.com

**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**

Dated: July 27, 2012

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
11. “AEP” means American Electric Power and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
12. “Company” means Kentucky Power Co. d/b/a American Electric Power, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

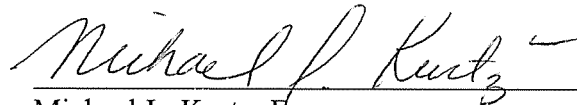
INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

**KIUC SUPPLEMENTAL DATA REQUESTS
TO KENTUCKY POWER COMPANY
PSC CASE NO. 2012-00226**

- Q2.1. Refer to the Company's response to KIUC Q1-10. Please identify each customer that informed the Company that "they would shift very little load from higher-priced periods to lower-priced periods." Also please provide copies of all documents supporting the customer's stated intention to "shift very little load from higher-priced periods to lower-priced periods."
- Q2.2. Explain whether any customers taking service under the existing Tariff RTP have indicated that they may shift any portion of their load from higher-priced to lower-priced periods. If so:
- a. Please describe the amount of load any such customers have indicated they will shift from higher-priced to lower-priced periods.
 - b. Please provide copies of all documents supporting the customer's statement that they may shift any portion of their load from higher-priced periods to lower-priced periods.
- Q2.3. Refer to the Company's Response to KIUC Q1.5. If the Commission were to approve the continuation of existing Tariff RTP, either through its current expiration date or on a permanent basis, does the Company maintain that the 10 customer limitation should likewise be continued? If so, please provide the Company's explanation for continuing the 10 customer limitation to participation in existing Tariff RTP.
- Q2.4. Refer to the Company's Response to KIUC Q1.5. Please provide an explanation for establishing the 10 customer limitation to participation for Rider RTP.
- Q2.5. Has any customer of the Company expressed interest in taking service under proposed Rider RTP at any time? If so:
- a. Please indicate how many customers have expressed interest in taking service under proposed Rider RTP and the approximate dates when the customer expressed interest in taking service under proposed Rider RTP.
 - b. Please provide copies of all correspondence (letters, emails, informal requests for which there is documentation) from any customer requesting information and/or expressing interest about proposed Rider RTP.
 - c. Please provide copies of all correspondence, studies, evaluations, spreadsheets, notes of meetings provided by the Company to any customer regarding Rider RTP in response to a customer request for information or analyses regarding Rider RTP. [Note, customer names or other identifiers can be removed for confidentiality purposes].

Respectfully submitted,



Michael L. Kurtz, Esq.

Kurt J. Boehm, Esq.

Jody M. Kyler, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764

mkurtz@BKLawfirm.com

kboehm@BKLawfirm.com

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