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JUL 8 0 2013

PUT 10 SERVICE COMMISSION 421 West Main Street Post Office Box 634 Frankfort, KY 40602-0634 [502] 223-3477 [502] 223-4124 Fax www.stites.com

Mark R. Overstreet (502) 209-1219 (502) 223-4387 FAX

moverstreet@stites.com

July 30, 2013

#### HAND DELIVERED

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

RE: <u>Case No. 2012-00578</u>

Dear Mr. Derouen:

Enclosed please find and accept for filing the original and eight copies of Kentucky Power Company's July 26, 2013 responses to the following data requests:

- (a) KIUC 1-89; 1-90; and 1-93; and
- (b) Staff 1-66.

A copy of this letter and the Company's responses is being served by overnight delivery on the individuals indicated below and their associated counsel. Further, in accordance with Mr. Nguyen's request, a copy of the responses also is being served by overnight delivery on Messrs. Drabinski, Boismenu, and Buechel.

Alexandria, VA Atlanta, GA Frankfort, KY Franklin, TN Jeffersonville, IN Lexington, KY Louisville, KY Nashville, TN

## STITES & HARBISON PLLC ATTORNEYS

Jeff R. Derouen July 30, 2013 Page 2

MRO

cc:

Michael L. Kurtz

Jennifer Black Hans

Shannon Fisk Joe F. Childers Lane Kollen

Rob Kapla Tim Woolf

ery truly yours,

Mark R. Overstree

## COMMONWEALTH OF KENTUCKY

# RECEIVED

### BEFORE THE PUBLIC SERVICE COMMISSION

JUL 3 0 2013

PUBLIC SERVICE COMMISSION

#### IN THE MATTER OF:

THE APPLICATION OF KENTUCKY POWER COMPANY FOR:	)
(1) A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY	)
AUTHORIZING THE TRANSFER TO THE COMPANY OF AN	)
UNDIVIDED FIFTY PERCENT INTEREST IN THE MITCHELL	)
GENERATING STATION AND ASSOCIATED ASSETS; (2) APPROVAL	()
OF THE ASSUMPTION BY KENTUCKY POWER COMPANY OF	)
CERTAIN LIABILITIES IN CONNECTION WITH THE TRANSFER OF	`)
THE MITCHELL GENERATING STATION; (3) DECLARATORY	) CASE NO. 2012-00578
RULINGS; (4) DEFERRAL OF COSTS INCURRED IN CONNECTION	)
WITH THE COMPANY'S EFFORTS TO MEET FEDERAL CLEAN AIR	.)
ACT AND RELATED REQUIREMENTS; 5) FOR ALL OTHER	)
REOUIRED APPROVALS AND RELIEF	)

## KENTUCKY POWER COMPANY RESPONSE TO

KIUC FIRST SET OF DATA REQUESTS ITEM NO. 89, 90, and 93

July 30, 2013

#### **VERIFICATION**

The undersigned, Ranie K. Wohnhas, being duly sworn, deposes and says he is the Managing Director Regulatory and Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge, and belief

Ranie K. Wohnhas

COMMONWEALTH OF KENTUCKY

) CASE NO. 2012-00578

COUNTY OF FRANKLIN

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

botary I defic

My Commission Expires: January 23, 2017

KPSC Case No. 2012-00578
KIUC First Set of Data Requests
Dated February 6, 2013
Item No. 89
Page 1 of 2
Supplemental Response filed July 30, 2013

## **Kentucky Power Company**

### REQUEST

Please provide the amount of the Company's capacity equalization payments pursuant to the Interconnection Agreement by month for the period January 2011 through the most recent month for which actual information is available. Provide all assumptions and all calculations, including electronic workpapers in live format with cell formulas intact and a copy of all source documents relied on for the assumptions or other inputs to the calculations and workpapers. Please consider this request continuing in nature and supplement the response each month as actual information for that month is available.

#### RESPONSE

Please see the Company's response to KPSC 1-7, for the amount of the Company's capacity equalization payments pursuant to the Interconnection Agreement by month for the period January 2011 through December 2012, as calculated and recorded in the monthly Interchange Power Statements. Please see the Company's response to KIUC 1-93 for the respective Interchange Power Statements.

## March 11, 2013 Supplemental Response

The capacity equalization payment for January 2013 was \$(1,713,770). Please see also the March 11, 2013 supplemental response to KIUC 1-93 for an electronic copy of the January 2013 Interchange Power Statement.

## April 15, 2013 Supplemental Response

The capacity equalization payment for February 2013 was \$(2,206,292). Please see also the April 15, 2013 supplemental response to KIUC 1-93 for an electronic copy of the February 2013 Interchange Power Statement.

KPSC Case No. 2012-00578 KIUC First Set of Data Requests Dated February 6, 2013 Item No. 89 Page 2 of 2 Supplemental Response filed June 24, 2013

## May 22, 2013 Supplemental Response

The capacity equalization payment for March 2013 was (\$2,321,560). Please see also the May 22, 2013 supplemental response to KIUC 1-93 for an electronic copy of the March 2013 Interchange Power Statement.

## June 24, 2013 Supplemental Response

The capacity equalization payment for April 2013 was (\$2,136,932). Please see also the June 24, 2013 supplemental response to KIUC 1-93 for an electronic copy of the April 2013 Interchange Power Statement.

## July 30, 2013 Supplemental Response

The capacity equalization payment for May 2013 was (\$2,151,556). Please see also the July 30, 2013 supplemental response to KIUC 1-93 for an electronic copy of the May 2013 Interchange Power Statement.

KPSC Case No. 2012-00578
KIUC First Set of Data Requests
Dated February 6, 2013
Item No. 90
Page 1 of 2
Supplemental Response filed July 30, 2013

## **Kentucky Power Company**

#### REQUEST

Please provide the amount of the Company's capacity equalization payments pursuant to the Interconnection Agreement included in ECR rates by month for the period January 2011 through the most recent month for which actual information is available. Provide all assumptions and all calculations, including electronic workpapers in live format with cell formulas intact and a copy of all source documents relied on for the assumptions or other inputs to the calculations and workpapers. Please consider this request continuing in nature and supplement the response each month as actual information for that month is available.

#### RESPONSE

Please see KIUC 1-90 Attachment 1 on the enclosed CD for the Company's capacity payments pursuant to the Interconnection Agreement included in the ECR rates for January 2011 through December 2012.

## March 11, 2013 Supplemental Response

Please see KIUC 1-90, Attachment 1 on the enclosed CD for the Company's capacity payments pursuant to the Interconnection Agreement included in the ECR rates for January 2011 through January 2013.

## April 15, 2013 Supplemental Response

Please see KIUC 1-90, Attachment 1 on the enclosed CD for the Company's capacity payments pursuant to the Interconnection Agreement included in the ECR rates for January 2011 through February 2013.

KPSC Case No. 2012-00578 KIUC First Set of Data Requests Dated February 6, 2013 Item No. 90 Page 2 of 2 Supplemental Response filed June 24, 2013

### May 22, 2013 Supplemental Response

Please see KIUC 1-90, Attachment 1 on the enclosed CD for the Company's capacity payments pursuant to the Interconnection Agreement included in the ECR rates for January 2011 through March 2013.

June 24, 2013 Supplemental Response

Please see KIUC 1-90, Attachment 1 on the enclosed CD for the Company's capacity payments pursuant to the Interconnection Agreement included in the ECR rates for January 2011 through April 2013.

July 30, 2013 Supplemental Response

Please see KIUC 1-90, Attachment 1 on the enclosed CD for the Company's capacity payments pursuant to the Interconnection Agreement included in the ECR rates for January 2011 through May 2013.

KPSC Case No. 2012-00578
KIUC First Set of Data Requests
Dated February 6, 2013
Item No. 93
Page 1 of 1
Supplemental Response filed July 30, 2013

### **Kentucky Power Company**

#### REQUEST

Please provide a copy of the AEP monthly reports detailing the Interconnection Agreement allocations and payments and receipts for the period January 2011 through the most recent month for which the reports are available.

#### RESPONSE

Please see KIUC 1-93, Attachment 1 on the enclosed CD.

#### March 11, 2013 Supplemental Response

Please see KIUC 1-93, Attachment 1 on the enclosed CD for a copy of the January 2013 Interchange Power Statement.

#### April 15, 2013 Supplemental Response

Please see KIUC 1-93, Attachment 1 on the enclosed CD for a copy of the February 2013 Interchange Power Statement.

#### May 22, 2013 Supplemental Response

Please see KIUC 1-93, Attachment 1 on the enclosed CD for a copy of the March 2013 Interchange Power Statement.

#### June 24, 2013 Supplemental Response

Please see KIUC 1-93, Attachment 1 on the enclosed CD for a copy of the April 2013 Interchange Power Statement.

### July 30, 2013 Supplemental Response

Please see KIUC 1-93, Attachment 1 on the enclosed CD for a copy of the May 2013 Interchange Power Statement.

## RECEIVED

#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

JUL 3 0 2013

#### IN THE MATTER OF:

THE APPLICATION OF KENTUCKY POWER COMPANY FOR:	)
(1) A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY	)
AUTHORIZING THE TRANSFER TO THE COMPANY OF AN	)
UNDIVIDED FIFTY PERCENT INTEREST IN THE MITCHELL	)
GENERATING STATION AND ASSOCIATED ASSETS; (2) APPROVAL	۷)
OF THE ASSUMPTION BY KENTUCKY POWER COMPANY OF	)
CERTAIN LIABILITIES IN CONNECTION WITH THE TRANSFER OF	7)
THE MITCHELL GENERATING STATION; (3) DECLARATORY	) CASE NO. 2012-00578
RULINGS; (4) DEFERRAL OF COSTS INCURRED IN CONNECTION	)
WITH THE COMPANY'S EFFORTS TO MEET FEDERAL CLEAN AIR	.)
ACT AND RELATED REQUIREMENTS; 5) FOR ALL OTHER	)
REQUIRED APPROVALS AND RELIEF	)

KENTUCKY POWER COMPANY SUPPLEMENTAL RESPONSETO
COMMISSION STAFF FIRST SET OF DATA REQUESTS ITEM NO. 66

July 30, 2013

#### **VERIFICATION**

The undersigned, Ranie K. Wohnhas, being duly sworn, deposes and says he is the Managing Director Regulatory and Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge, and belief

	Kanie K. Wohml
	Ranie K. Wohnhas
COMMONWEALTH OF KENTUCKY	)
COUNTY OF FRANKLIN	) CASE NO. 2012-00578

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Ranie K. Wohnhas, this the 3000 day of July 2013.

Jotary Public

My Commission Expires: January 23, 3017

KPSC Case No. 2012-00578
Commission Staff's First Set of Data Requests
Order Dated February 6, 2013
Item No. 66
Page 1 of 3
Supplemental Response filed July 30, 2013

### **Kentucky Power Company**

#### REQUEST

- a. Provide Kentucky Power's actual cost to prepare and present Case No. 2011-004019.
- b. Provide Kentucky Power's actual cost to date to prepare and present this case in the current proceedings, and going forward, provide monthly updates. This should be considered a recurring data request.

#### RESPONSE

a & b. Please see table below:

KPSC Case Number	Total Cost to Present	
2011-00401	\$855,638.69	
2012-00578	\$396,637.74	

<sup>\*</sup> Total Cost as of January 31, 2013.

#### March 21, 2013 Supplemental Response

Please see the response to KPSC 2-26 for the monthly update to this response.

KPSC Case No. 2012-00578 Commission Staff's First Set of Data Requests Order Dated February 6, 2013 Item No. 66 Page 2 of 3 Supplemental Response filed June 24, 2013

### April 15, 2013 Supplemental Response

b. Please see table below:

Category	Expenditures (as of 3/31/13)
KPCo Labor (Including Overheads)	\$67,495.87
AEPSC Labor (Including Overheads)	\$535,668.46
Outside Services-Legal	\$117,046.58
Outside Services-Professional	\$30,000.00
Other Charges	\$3,193.73
	\$753,404.64

### May 22, 2013 Supplemental Response

b. Please see table below.

Category	Expenditures (as of 4/30/13)
KPCo Labor (Including Overheads)	\$85,847
AEPSC Labor (Including Overheads)	\$644,336
Outside Services-Legal	\$166,227
Outside Services-Professional	\$60,680
Other Charges	\$7,328
	\$964,418

KPSC Case No. 2012-00578
Commission Staff's First Set of Data Requests
Order Dated February 6, 2013
Item No. 66
Page 3 of 3
Supplemental Response filed June 24, 2013

### June 24, 2013 Supplemental Response

b. Please see table below.

Category	Expenditures (as of 5/31/13)
KPCo Labor (Including Overheads)	\$110,477
AEPSC Labor (Including Overheads)	\$908,684
Outside Services-Legal	\$258,927
Outside Services-Professional	\$132,218
Other Charges	\$12,377
	\$1,422,683

### July 30, 2013 Supplemental Response

b. Please see table below.

Category	Expenditures (as of 6/30/13)
KPCo Labor (Including Overheads)	\$121,389
AEPSC Labor (Including Overheads)	\$910,030
Outside Services-Legal	\$332,841
Outside Services-Professional	\$153,456
Other Charges	\$17,760
	\$1,535,476

<sup>)</sup> Id