

**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  
Kentucky Industrial Utility Customers, Inc.**

Kentucky Power Company propounds the following Data Requests to Kentucky  
Industrial Utility Customers, Inc.

**Instructions and Definitions**

**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 or 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 data request 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 Company, Inc..

12. “Company” or “Kentucky Power” means Kentucky Power Company.

13. “KIUC” means Kentucky Industrial Utility Customers, Inc. and any of its 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 data request should be construed independently and not with reference to any other data request 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 data request, 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 data request 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.

#### 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 provide in their original form, with all calculations operable and formulas intact and unprotected, all electronic spreadsheets and other calculations used, developed in connection with the preparation of, referenced, or contained in Mr. Hill's testimony, analyses, and exhibits filed in this proceeding.
2. Please provide copies of all documents, articles, studies, or other publications referenced in Mr. Hill's testimony.
3. Does Mr. Hill agree that bond rating agencies, such as Standard & Poor's Corporation, consider the impact of regulation on a utility's risks when evaluating credit ratings? If the answer is anything other than an unqualified, "yes", please provide a complete explanation.
4. Please refer to page 3, line 18 through page 4, line 9, of Mr. Hill's testimony. Please provide a list of all cost recovery mechanisms applicable to each of the utilities in Mr. Hill's proxy group, including all environmental cost recovery trackers. If Mr. Hill did not examine the extent to which his proxy utilities operate under similar adjustment mechanisms, please explain why not, including any support for his decision not to do so.
5. Please refer to page 4, lines 5-6, of Mr. Kollen's testimony. Please provide all supporting calculations and spreadsheets—with all calculations operational and formulas intact and unprotected—that were utilized to determine or otherwise relied upon by Mr. Kollen to support his testimony that "the purchase option" would yield a rate increase impact in 2016 of between "9.9% to 11.9%."
6. Please refer to Mr. Kollen's testimony at page 8, lines 3-9. Provide all supporting spreadsheets—with all calculations operational and formulae intact and unprotected—that were

used to determine the \$9.326 million increase in revenue requirement referred to by Mr. Kollen in his testimony.

7. Please refer to Mr. Kollen's testimony at page 9, lines 2-7. Provide all calculations in electronic spreadsheet format, with all calculations operable and formulas intact and unprotected, that support or were relied upon by Mr. Kollen in calculating the 35.23% "total percentage increase to retail customers" to which Mr. Kollen testifies.

8. Please refer to Mr. Kollen's Exhibit LK-3.

a. Please provide Exhibit LK-3 in electronic spreadsheet format, with all calculations operable and formulas intact and unprotected;

b. Please provide a complete explanation, including all support, of the basis for Mr. Kollen's allocation of all of the costs of the DHGD only to the retail and wholesale customers, with none being allocated to the non-associated or the associated utility sales.

9. Please refer to page 31, lines 11-30 of Mr. Kollen's testimony and Exhibit LK-15. Please provide Exhibit LK-15 in electronic spreadsheet format, with all calculations operable and formulas intact and unprotected.

10. Please refer to the chart presented at the top of page 37 of Mr. Kollen's testimony. Please provide:

a. the chart presented at top of page 37 of Mr.Kollen's testimony in electronic format;

b. in electronic spreadsheet format, with all calculations operable and formulas intact and unprotected, all calculations used to construct the chart presented at top of page 37 of Mr.Kollen's testimony;

c. the source of all data used in the calculations referred to in subpart (b) of this data request.

11. Please refer to the chart presented at the top of page 40 of Mr. Kollen's testimony.

Please provide:

a. the chart presented at top of page 40 of Mr.Kollen's testimony in electronic format;

b. in electronic spreadsheet format, with all calculations operable and formulas intact and unprotected, all calculations used to construct the chart presented at top of page 40 of Mr.Kollen's testimony.

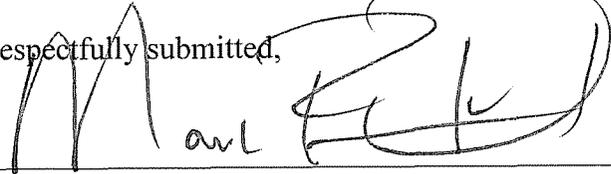
c. the source of all data used in the calculations referred to in subpart (b) of this data request.

12. Please refer to Exhibit LK-24 of Mr. Kollen's testimony. Please provide:

a. Exhibit LK-24 of Mr. Kollen's testimony in electronic spreadsheet format, with all calculations operable and formulas intact and unprotected;

b. the source of all data used in the spreadsheet and calculations referred to in subpart (a) of this data request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark R. Overstreet", written over a horizontal line. The signature is stylized and somewhat cursive.

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 23<sup>rd</sup> 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

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

Mark R. Overstreet