

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

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 RULINGS; (4) DEFERRAL OF COSTS INCURRED IN CONNECTION WITH THE COMPANY'S EFFORTS TO MEET FEDERAL CLEAN AIR ACT AND RELATED REQUIREMENTS; AND (5) ALL OTHER REQUIRED APPROVALS AND RELIEF

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APR 10 2013

PUBLIC SERVICE
COMMISSION

Case No. 2012-00578

KENTUCKY POWER COMPANY'S DATA REQUESTS TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

* * * * *

Pursuant to the Commission's Order dated March 4, 2013, Kentucky Power Company propounds the following data requests to be answered by Kentucky Industrial Customers, Inc. and each its members participating in this proceeding:

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. “Identify” used in a fashion other than as described in instructions 3-6 above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
8. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

10. 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.

11. “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.

12. “KIUC” means Kentucky Industrial Utility Customers, Inc., its employees, agents, and its members identified in paragraph 1 of its December 21, 2012 petition to intervene in this proceeding, Lane Kollen, Philip Hayet, and J. Kennedy and Associates, Inc.

13. “PJM” means PJM Interconnection.

14. “Company” means Kentucky Power Company.

15. “AEP” means American Electric Power Company, Inc.

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, without regard to the date created or obtained, 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 Power. Any studies, evaluations, analyses, 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. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

Data Requests

1. Please refer to page 8, line 16 through page 9, line 4 of Mr. Kollen's testimony.

(a) Please calculate Kentucky Power's capacity position in PJM, by planning year, beginning in the 2015/2016 PJM planning year through the PJM 2030/2031 planning year assuming the transfer of an undivided 20% interest in the Mitchell generating station, the conversion of Big Sandy Unit 1 to natural gas, and market purchases recommended by KIUC (the "Recommendation.") Please provide all work papers spreadsheets, and calculations electronically, with formulas intact and visible, and no pasted values.

(b) Please identify, by planning year, each assumption relied upon by Mr. Kollen in connection with his calculations.

2. Does Mr. Kollen contend that the Commission should evaluate the proposed transfer of a 50% undivided interest in the Mitchell generating station based upon a single year's capacity position?

(a) If the answer is an unqualified "yes," please provide a detailed explanation for Mr. Kollen's response, including any articles or research or other evidence relied upon by Mr. Kollen in reaching that conclusion.

(b) If the answer is an unqualified "no," please state the appropriate period the Commission should evaluate the proposed transfer of a 50% undivided interest in the Mitchell generating station. Also please provide a detailed explanation for Mr. Kollen's response, including any articles or research or other evidence relied upon by Mr. Kollen in reaching his response.

(c) If the answer is anything other than an unqualified "yes" or an unqualified "no," please provide a detailed explanation for Mr. Kollen's response, including any articles or research or other evidence relied upon by Mr. Kollen in reaching his response.

3. Please refer to page 4, lines 1-4, page 5, lines 8-10, 17-18, 25-27, page 8, line 16 through page 9, line 4, and page 19, lines 9-15 of Mr. Kollen's testimony. There he testifies concerning KIUC's request that the Commission approve only the Recommendation.

(a) Please provide all documents, correspondence, e-mail and other electronic communications mentioning, relating to, or describing the Recommendation in the possession of KIUC.

(b) Please identify and provide all evaluations, studies, spreadsheets, work papers, calculations, analyses, or calculations relating to, reviewed by, consulted, or relied upon by KIUC in reaching the Recommendation. Please provide all analyses, work papers spreadsheets, and calculations electronically, with formulas intact and visible, and no pasted values.

(c) With respect to the items identified or provided in response to subparts (a) and (b) above, please identify each item KIUC contends supports the Recommendation.

(d) Please identify, including the specific amount of capacity to be provided by each component, of any plan, scenario, or possible recommendation considered, examined, studied, discussed, or mentioned by KIUC for supplying Kentucky Power's capacity and energy needs beginning January 1, 2014 other than the Recommendation ("Other Scenarios").

(e) Please provide all documents, correspondence, e-mail and other electronic communications mentioning, relating to, or describing any of the Other Scenarios in the possession of KIUC.

(f) Please provide all evaluations, studies, spreadsheets, work papers, calculations, analyses, or calculations relating to, reviewed by, consulted, or relied upon by KIUC relating to, describing or mentioning any of the Other Scenarios. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(g) For each Other Scenario identified in subpart (d) please provide all facts KIUC contends supports its decision not to recommend the Other Scenario to the Commission.

(h) With respect to the items identified or provided in response to subparts (e) and (f) above, please identify each item KIUC contends supports its decision not to recommend the Other Scenario to the Commission.

(i) If KIUC analyzed only the scenario set forth in the Recommendation, please explain why other scenarios were not analyzed?

4. Please refer to page 5, lines 8-12, and page 21, lines 14-18 of Mr. Kollen's testimony.

(a) Please quantify, by year, through at least 2030 the number of local jobs KIUC contends will be produced by its Recommendation. Please provide all analyses, work papers, spreadsheets, and calculations used in calculating the answer to this data request. The requested information should be provided in electronic format with formulas intact and visible, and no pasted values.

(i) Please identify and provide all documents, evaluations, reports, and studies relating to, reviewed by, consulted, or relied upon by Mr. Kollen in connection with his testimony referenced above concerning local jobs.

(ii) Please identify and provide all spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, or relied upon by Mr. Kollen in connection with his testimony referenced above concerning local jobs. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(iii) Please provide a detailed explanation of how the Recommendation will increase jobs in Kentucky.

(b) Please quantify, by year, through at least 2030 the local property taxes KIUC contends will be produced by its Recommendation.

(i) Please identify and provide all documents, evaluations, reports, and studies relating to, reviewed by, consulted, or relied upon by Mr. Kollen in connection with his testimony referenced above concerning local taxes.

(ii) Please identify and provide all spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, or relied upon by Mr. Kollen in connection with his testimony referenced above concerning local taxes. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(iii) Please provide a detailed explanation of how the Recommendation will increase property taxes in Kentucky.

(c) Does KIUC contend that the Commission may consider the effect the Company's request to receive a transfer of 50% of the Mitchell generating station will have on local jobs and local taxes in approving or rejecting the Company's application in this proceeding?

(d) If the answer to subpart (c) is anything but an unqualified no, please provide the relevant statutory, case law, and Commission decisional basis supporting KIUC's answer to subpart (c).

5. Please refer to Mr. Kollen's testimony beginning at page 8, line 16 through page 9, line 4 and the Kentucky Power's response to KIUC 2-26.

(a) Please describe in detail Mr. Kollen's understanding of the method used by PJM to establish Kentucky Power's capacity resource requirement for the 2014/2015 planning year.

(b) Please describe in detail Mr. Kollen's basis for selecting the Company's forecasted July 2014 peak demand instead of the Company's forecasted August 2014 peak demand.

6. Please refer to Mr. Kollen's testimony at page 21, lines 1-7.

(a) Please identify each fact upon which Mr. Kollen relies in testifying that "the Company's interests and those of its customers are subservient to the economic and political interests of Appalachian Power Company...."

(b) Please identify and produce each document Mr. Kollen contends supports the identified testimony.

7. Please refer to Mr. Kollen's testimony at page 21, lines 11-14. Please assume that the 50% interest in the Mitchell generating station that is the subject of this proceeding were located in Lawrence County, Kentucky. Does Mr. Kollen contend that the total tax expense payable by Kentucky Power from 2017 through the assumed remaining life of the Mitchell units would be less if located in Lawrence County, Kentucky than it would in light of the units West Virginia location? If the answer to this data request is anything other than an unqualified "no," please provide all spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, that support or are relied upon by Mr. Kollen in answering this data request. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

8. Please refer to Mr. Kollen's testimony at page 13, lines 6-9 and page 14, lines 10-19 and Exhibit LK-6 (KIUC 2-29(e), Attachment 1 and Attachment 2).

(a) Please identify which of the identified assets Mr. Kollen contends is a "similar asset" that should have been considered by the Company in the purchase and sale review advocated by Mr. Kollen at page 13.

(b) For each such "similar asset" please provide all facts supporting Mr. Kollen's contention that the asset is a "similar asset."

9. Please refer to page 13, line 16 through page 14, line 8 of Mr. Kollen's testimony. With respect to the Dominion and Ameren transactions referenced there please provide for each transaction the following:

(a) All documents reviewed or used by Mr. Kollen in his analysis of the transactions;

(b) All spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, that were performed, consulted or relied upon by Mr. Kollen with respect to the identified transactions. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

10. Please refer to page 13, line 16 through page 14, line 8 of Mr. Kollen's testimony. Please identify any transactions noted or reviewed by Mr. Kollen in connection with the preparation of the identified testimony that were not included in the identified testimony. Individually, for each such transaction, please provide the following information:

(a) All documents reviewed or used by Mr. Kollen in his analysis of the transactions that were not included;

(b) All spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, that were performed, consulted or relied upon by Mr. Kollen with respect to the transactions that were not included. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(c) A detailed explanation of the basis for the decision not to include each transaction.

11. Please refer to page 16, lines 10-17 of Mr. Kollen's testimony. Does KIUC agree that the Company's April 10, 2013 application seeking Commission approval of the Renewable Energy Purchase Agreement for Biomass Energy Resources between ecoPower Generation-Hazard LLC and Kentucky Power Company Kentucky Power Company will promote fuel diversity? If the answer to this data request anything but an unqualified "yes," please provide each fact relied upon by KIUC in failing to answer with an unqualified "yes."

12. Please refer to page 18, lines 15-16 of Mr. Kollen's testimony. Does KIUC contend that if the Commission does not approve the Company's application in this proceeding that AEP Generation Resources Inc. is obligated to make the Mitchell capacity (as described in the identified testimony) available to Kentucky Power beginning June 2015? If the answer to this data request is anything other than an unqualified "no," please provide the following:

(a) Each fact supporting the answer.

(b) Each document relied upon in support of the answer.

13. Please refer to page 20, lines 1-6 of Mr. Kollen's testimony. Does Mr. Kollen contend the fact that "all planning analyses were performed by and supported by AEP Service Corporation or a consultant retained to support AEP Service Corporation's analyses" renders Kentucky Power's decision-making subject to AEP? If the answer to this data request is anything other than an unqualified "no," please state each fact upon which Mr. Kollen relies in support of his answer.

14. Please refer to page 13, line 20 through page 14, line 1. Please provide a copy of the referenced *Wall Street Journal* article.

15. Please refer to page 30, line 14 through page 31, line 13 of Mr. Kollen's testimony. Please provide all spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, that were performed by, consulted or relied upon by Mr. Kollen in connection with his testimony that Administrative and General Expenses, except for employee benefit expenses, were not included in the Company's Strategist modeling of the proposed acquisition of a 50% interest in the Mitchell generating station. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

16. Please refer to page 18, lines 1-7 and Figure 4 of Mr. Hayet's testimony.

(a) Please provide all statistical or other analyses used or referred to by Mr. Hayet, including all spreadsheets, work papers, calculations, analyses, and calculations, that were performed, consulted or relied upon by Mr. Hayet in connection with his testimony that “the graph confirms that there is a linear relationship between the Company’s fuel prices and market energy prices.” The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet in connection with his preparation of the identified testimony and Figure 4.

17. Please refer to page 19, footnote 4 of Mr. Hayet’s testimony.

(a) Please provide all spreadsheets, work papers, calculations, analyses, and calculations relating to, reviewed by, consulted, that were performed by, consulted or relied upon by Mr. Hayet, to “derive[] new emergency power price inputs consistent with the new market energy price forecasts.” The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (b) of this request.

18. Please refer to page 22, Table 1 of Mr. Hayet’s testimony. Please provide the following information with respect to the table:

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet to create the Strategist inputs for KIUC’s revised commodity price forecasts (gas, coal, market and ICAP) that were the basis for KIUC’s revised results found in Table 1.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide all tools used and step-by-step instructions for the process used to create the revised commodity price forecasts. The instructions should identify the tools, spreadsheets, tabs, and cell locations used.

(d) Please provide in electronic format (.SAV or .FSV) all Strategist databases used to create the results found in Tables 1.

(e) Please supply all tools used to extract data from Strategist and then enter that data into the spreadsheet(s) used to create Table 1. This could include templates, spreadsheets, programs, or Strategist Report Agent templates (.TPL files). The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

19. Please refer to page 25, Table 2 of Mr. Hayet’s testimony. Please provide the following information with respect to the table:

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet to create the Strategist inputs for KIUC's revised commodity price forecasts (gas, coal, market and ICAP) that were the basis for KIUC's revised results found in Table 2.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide all tools used and step-by-step instructions for the process used to create the revised commodity price forecasts. The instructions should identify the tools, spreadsheets, tabs, and cell locations used.

(d) Please provide in electronic format (.SAV or .FSV) all Strategist databases used to create the results found in Tables 2.

(e) Please supply all tools used to extract data from Strategist and then enter that data into the spreadsheet(s) used to create Table 2. This could include templates, spreadsheets, programs, or Strategist Report Agent templates (.TPL files). The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

20. Please refer to page 27, Table 3 of Mr. Hayet's testimony. Please provide the following information with respect to the table:

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet to create the Strategist inputs for KIUC's revised commodity price forecasts (gas, coal, market and ICAP) that were the basis for KIUC's revised results found in Table 3.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide all tools used and step-by-step instructions for the process used to create the revised commodity price forecasts. The instructions should identify the tools, spreadsheets, tabs, and cell locations used.

(d) Please provide in electronic format (.SAV or .FSV) all Strategist databases used to create the results found in Tables 3.

(e) Please supply all tools used to extract data from Strategist and then enter that data into the spreadsheet(s) used to create Table 3. This could include templates, spreadsheets, programs, or Strategist Report Agent templates (.TPL files). The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

21. Please refer to page 13, line 12 through page 14, line 5 and Figure 1 of Mr. Hayet's testimony.

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet in connection with his preparation of the identified testimony and Figure 1.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide Figure 1 electronically. The requested information should be provided in native format, with formulas intact and visible, and no pasted values.

(d) If different from the response to subpart (c) above, please provide all tools used to create Figure 1. The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

22. Please refer to page 14, line 7 through page 15, line 6 and Figure 2 of Mr. Hayet's testimony.

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet in connection with his preparation of the identified testimony and Figure 2.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide Figure 2 electronically. The requested information should be provided in native format, with formulas intact and visible, and no pasted values.

(d) If different from the response to subpart (c) above, please provide all tools used to create Figure 2. The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

23. Please refer to page 15, line 7 through page 16, line 12 and Figure 3 of Mr. Hayet's testimony.

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet in connection with his preparation of the identified testimony and Figure 3.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide Figure 3 electronically. The requested information should be provided in native format, with formulas intact and visible, and no pasted values.

(d) If different from the response to subpart (c) above, please provide all tools used to create Figure 3. The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

24. Please refer to page 23, line 14 through page 24, line 6 and Figure 5 of Mr. Hayet's testimony.

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet in connection with his preparation of the identified testimony and Figure 5.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide Figure 5 electronically. The requested information should be provided in native format, with formulas intact and visible, and no pasted values.

(d) If different from the response to subpart (c) above, please provide all tools used to create Figure 5. The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

25. Please refer to page 27, lines 9-20 and Table 3 of Mr. Hayet's testimony.

(a) Please identify by publisher, date of publication of publication, and title all supporting documentation and source documents used or reviewed by Mr. Hayet to create the Strategist inputs (fuel, variable O&M, fixed O&M, and ongoing capital expenditures) for the Mitchell units used or referred to in the preparation of the identified testimony and Table 3.

(b) Please provide, in electronic format if available, the supporting documentation and source documents identified in the response to subpart (a) of this request.

(c) Please provide all tools used and step-by-step instructions for the process used to create the inputs for the Mitchell units. The instructions should identify the tools, spreadsheets, tabs, and cell locations used.

26. Please refer to page 28, lines 11-15 of Mr. Hayet's testimony. There, Mr. Hayet testified that "KPCO customers would save approximately \$60 million on a net present value basis over the period of 2011 to 2040 if KPCO only acquires a 20% interest in Mitchell compared to the Company's preference to acquire 50%." Please provide the following with respect to the identified testimony:

(a) The specific assumptions relied upon, and inputs utilized, in the indicated calculation that yielded the \$60 million saving;

(b) Please provide all work papers, spreadsheets, analyses, Strategist databases (.SAV or .FSV), supporting input assumption documents, input tools, and other calculations that support the identified savings, or that were reviewed or relied upon by Mr. Hayet in connection with the preparation of the indicated statement in his testimony. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

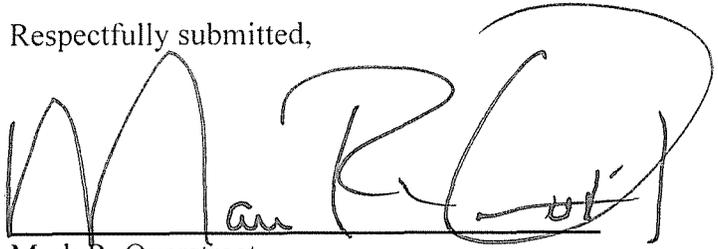
27. Please refer to page 29, lines 6-16 of Mr. Hayet's testimony. There, Mr. Hayet testifies that "there would be a savings of approximately \$27 million if Mitchell were delayed until June 2015. With respect to the identified testimony, please provide the following:

(a) Please provide in electronic format all Strategist databases (.SAV or .FSV), supporting input assumption documents, input tools (whether Strategist or otherwise) used in the analysis referred to in the identified testimony.

(b) Please provide all Strategist reporting tools (e.g. Report Agent TPL files) and any other spreadsheets used to create and summarize the results referred to in the identified testimony. The requested information should be provided electronically in native format, with formulas intact and visible, and no pasted values.

28. Please refer to page 30, lines 8-9 of Mr. Hayet's testimony. Please provide all documents reviewed or relied upon by Mr. Hayet (including any EIA documents) in connection with his testimony that the EIA combined-cycle capital cost estimate is similar to LG&E's combined-cycle capital cost estimate. The requested information at a minimum should include a brief description of the CC technology type/configuration referenced or assumed, as well as a specific breakdown of the attendant installed cost (steam turbine, gas turbine HRSG, balance of plant, gas pipeline and transmission interconnection and all normally applicable project indirect cost (excluding AFUDC) all on a \$/kW basis.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark R. Overstreet" and "R. Benjamin Crittenden". The signature is written in a cursive style with large, sweeping letters.

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

Kenneth J. Gish, Jr.
STITES & HARBISON PLLC
250 West Main Street, Suite 2300
Lexington, Kentucky 40507
Telephone: (859) 226-2300

COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by e-mail transmission and first class mail, postage prepaid, upon the following parties of record, this 10th day of April, 2013.

Michael L. Kurtz
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, Ohio 45202

Jennifer Black Hans
Dennis G. Howard II
Lawrence W. Cook
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601

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

Robb Kapla
Staff Attorney
Sierra Club
85 Second Street
San Francisco, CA 94105-3441

Shannon F. Fisk
Earthjustice
1617 JFK Boulevard, Suite 1675
Philadelphia, Pennsylvania 19103

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

Mark R. Overstreet