

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

The Application of Kentucky Power Company for:)
(1) A General Adjustment of Its Rates for Electric)
Service; (2) An Order Approving Its 2014) Case No. 2014-00396
Environmental Compliance Plan; (3) An Order)
Approving Its Tariffs and Riders; and (4) An Order)
Granting All Other Required Approvals and Relief)

**KENTUCKY POWER COMPANY'S DATA REQUESTS TO
WAL-MART STORES EAST, LP AND SAM'S EAST, INC.**

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Pursuant to the Commission's Order dated January 13, 2015, Kentucky Power Company propounds the following data requests to be answered by Wal-Mart Stores East, LP and Sam's East, Inc.:

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 Walmart'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. "Walmart" means Wal-Mart Stores East, LP, Sam's East, Inc., Wal-Mart Stores, Inc., their employees, and agents.
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.

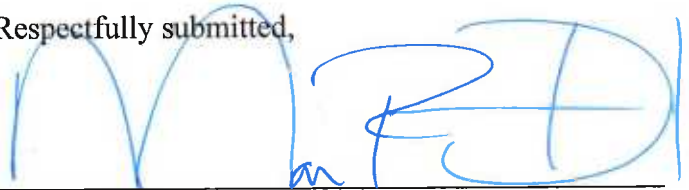
Data Requests

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Chriss in electronic format, with formulas intact and visible, and no pasted values.
2. 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. Chriss in connection with the preparation of his testimony. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please reference page 9 of the testimony of Mr. Chriss and in particular his statement that including CWIP in rate base "shifts the risks to ratepayers:"

- a. Please provide a complete explanation detailing the risks that Mr. Chriss believes are shifted to ratepayers by including CWIP in rate base.
 - b. Please provide copies of all source documents or other materials, including decisions of the Public Service Commission of Kentucky, relied on by Mr. Chriss to support his contention that including CWIP in rate base "shifts the risks to ratepayers.
 - c. Please identify and provide copies of any decisions of the Public Service Commission of Kentucky in which the Commission refused to include CWIP in rate base because it shifts the risks to the ratpayers."
 - d. Please provide copies of all documents indicating that the investment community or common stock investors share Mr. Chriss's view that including CWIP in rate base "shifts the risks to ratepayers."
 - e. Please provide all studies, analyses, or other document reviewed by Mr. Chriss that identify or quantify the extent to which other utilities are permitted to include CWIP in rate base.
 - f. Please quantify the risks Mr. Chriss contends are shifted to Kentucky Power's ratepayers by including CWIP in rate base in this proceeding. Provide all studies, analyses, or other documents prepared by or relied on by Mr. Chriss that quantify the impact of the risks identified in subpart (a) on the cost of equity to Kentucky Power Company.
4. Please refer to page 14, lines 16-19 of Mr. Chriss' testimony. Please explain in detail the effect, if any, the voltage at which service is taken (primary and secondary vs. transmission and sub-transmission) has on Kentucky Power's cost of service.
- 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. Chriss in connection with the preparation of his response to this request.
 - b. Please provide all source documents or references relied upon by Mr. Chriss in preparing his response to this request.
5. Please refer to page 14, lines 19-20, and Table 1, of Mr. Chriss' testimony. Please explain in detail the effect, if any, the average kWh usage per customer has on Kentucky Power's cost of service.
- 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. Chriss in connection with the preparation of his response to this request.

- b. Please provide all source documents or references relied upon by Mr. Chriss in preparing his response to this request.
6. Please reference Table 3 on page 17 of the testimony of Mr. Chriss. 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. Chriss in connection with the preparation of this table. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.
7. Please reference Table 4 of page 18 of the testimony of Mr. Chriss. 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. Chriss in connection with the preparation of this table. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

Respectfully submitted,



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Certificate of Service

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this the 6th day of April, 2015.

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