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Via Overnight Mail

November 9, 2005

Beth A. O'Donnell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

RECEIVED

NOV 10 2005

PUBLIC SERVICE
COMMISSION

Re: Case No. 2005-00341

Dear Ms. O'Donnell:

Please find enclosed the original and twelve (12) copies of the First Set of Data Requests of Kentucky Industrial Utility Customers, Inc. in the above-referenced matter. 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,



David F. Boehm, Esq.
Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

MLKkew
Attachment

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by first-class postage prepaid mail, and electronic mail, (when available) to all parties on the 11th day of November, 2005.


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Michael L. Kurtz, Esq.

RECEIVED

NOV 10 2005

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of: Kentucky Power Company Notice of Intent to :
File for an Adjustment of Electric Rates : **Case No. 2005-00341**

**FIRST SET OF DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Dated: November 9, 2005

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 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.
12. "KP" 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 FIRST SET OF DATA REQUESTS
PSC CASE NO. 2005-00341**

1. Please provide copies of all bond rating agency reports (Standard and Poor's, Moody's, Fitch, etc.) for Kentucky Power from 2003 through 2005.
2. Please provide copies of all securities analyst reports on American Electric Power from 2004 through 2005.
3. Please provide copies of Mr. Moul's work papers. Please provide all spreadsheet analyses on CD-ROM with formulas intact.
4. Please provide copies of all articles, treatises, publications and all other supporting documentation used by Mr. Moul in the preparation of his Direct Testimony. Please include copies of all articles cited by Mr. Moul in his Direct Testimony, Appendices, and Exhibits. Please provide all spreadsheet analyses on CD-ROM with formulas intact.
5. Please provide copies of all source documents relied upon by Mr. Moul in the preparation of his Appendices and Financial Exhibit and all Schedules.
6. Please provide the growth rates for the individual companies in Mr. Moul's Electric group that comprise the averages shown on Schedules 6 and 7. Provide copies of all source documentation for the individual company growth rates.
7. Please provide all work papers showing how Mr. Moul calculated his adjusted dividend yields for each company in his Electric Group that resulted in the average dividend yields shown on E-8 of Appendix E. Please provide all spreadsheet analyses on CD-ROM with formulas intact.
8. Please provide a citation and copy of the Modigliani and Miller article or treatise relied upon by Mr. Moul for his leverage adjustment calculated on pages E-13 through E-15 of Appendix E.
9. Please provide a copy of all work papers and supporting documentation for the capitalization ratios on page E-14 of Appendix E. Please provide all spreadsheet analyses on CD-ROM with formulas intact.
10. Please provide all work papers and supporting documentation for the leverage adjustment of 0.74% shown on page 31 of Mr. Moul's Direct Testimony. Please provide all spreadsheet analyses on CD-ROM with formulas intact.
11. Please provide all work papers and supporting documentation for the leverage adjustment of 0.99% shown on page 34 of Mr. Moul's Direct Testimony. Please provide all spreadsheet analyses on CD-ROM with formulas intact.
12. Please refer to page 42 of Mr. Moul's Direct Testimony.
 - a. Please provide the basis for the formula shown on line 19. Please provide copies of all articles, treatises, etc. upon which Mr. Moul relied for this formula.

- b. Please explain how the formula on line 19 adjusts for the difference between market capitalization and ratemaking capitalization.
 - c. Please provide any evidence or other support that investors use this formula in adjusting the Value Line betas. Please include copies of all studies, articles, treatises, etc. relied upon by Mr. Moul.
13. Is Mr. Moul aware of any regulatory commissions that employ the comparable earnings approach in setting the allowed rate of return? If so, please provide the following:
- a. Names of the regulatory commissions.
 - b. Citations to recent orders that adopted the use of the comparable earnings approach in setting the allowed return on equity.
 - c. Copies of the cited orders.
14. Please provide a copy of the Standard and Poor's guidelines cited on page 48 of Mr. Moul's Direct Testimony.
15. Please provide a copy of all workpapers and source documents relied on for the Company's filing, including, but not limited to, all electronic spreadsheets on CD (with formulas intact) supporting each of the Company's Schedules and Workpapers in Sections III and V of the filing and all Exhibits to the Company's Testimony.
16. Refer to Section V Schedule 4 page 3 and the Adjust State Issues Revenues in column 10. Please explain why there are no concomitant reductions to expense.
17. Please provide a history of O&M expense by FERC account for the most recent five calendar years and for the twelve months ending June 30, 2005.
18. Please provide a history of costs incurred by FERC plant account (capital expenditures) and O&M expense account for the Company's vegetation management program and for each of the nine T&D asset management programs for the most recent five calendar years and for the twelve months ending June 30, 2005.
19. Please provide a complete copy of the Company's two most recent pension and OPEB actuarial reports. Please reconcile the amounts reflected in these reports to the per books amounts reflected in the Company's historic test year (expense and capitalization) and to the amounts reflected in the proforma ratemaking amounts (expense and capitalization). Provide all workpapers, including electronic spreadsheets with formulas intact that were utilized to allocate or adjust amounts from the actuarial reports. In addition, please explain all adjustments to and/or allocations from the amounts included in the actuarial reports to the per books and ratemaking amounts reflected in the Company's filing.
20. Refer to Section V Workpaper S-4 page 30. Please provide all assumptions, data, computations, and workpapers, including electronic spreadsheets with formulas intact.
21. Please provide a copy of the Company's most recent cash working capital lead/lag study.

22. Please provide a copy of the Company's daily cash flow model, including all inputs translating accrual amounts to cash flow amounts and any other input assumptions. If the Company does not have its own daily cash flow model, then please provide the AEP model.
23. Please describe the Company's daily, weekly, and monthly cash flow planning process, including the basis for projecting the timing of receipts and disbursements.
24. Please provide a copy of the most recent cash working capital lead/lag studies prepared by or for each of the other AEP operating utilities for ratemaking purposes.
25. Refer to Section V, Workpaper S-2 page 2. Please provide the computational support for the apportionment factors for WV and OH state income taxes. In addition, please indicate whether the WV and OH state income taxes reflected in the GRCF on this schedule are ratemaking allocations of the income tax expense in WV and OH.
26. Refer to Section V, Workpaper S-2 page 2. Is the OH state income tax actually a franchise tax? Please explain.
27. Please confirm that the Company has jurisdictional sales in WV.
28. Refer to page 16 lines 12-13 of Mr. Wagner's Testimony. Please provide a copy of the Workpaper referenced in hard copy and in electronic format with formulas intact.
29. Refer to page 16 lines 15-19 of Mr. Wagner's Testimony. Please provide a copy of both documents referenced.
30. Refer to page 31 lines 10-17 of Mr. Wagner's Testimony. Please provide a copy of Appendix A to the Commission's Order in Case No. 99-149. It does not appear to be available on the Commission's website.
31. Refer to page 31 lines 10-17 of Mr. Wagner's Testimony. Please provide a schedule from Year 1 through the termination of the merger surcredit showing the annual merger costs and/or amortization, gross merger savings, and the computation of the annual shareholder savings and ratepayer merger surcredit.
32. Refer to page 34 lines 1-5 of Mr. Wagner's Testimony. Please provide a ten year history of storm damage reserve activity through June 2005, providing for each month, the beginning balance, the monthly accruals, the monthly payments, and the ending balance.
33. Refer to page 35 line 4 through page 37 line 14 of Mr. Wagner's Testimony. Please provide all workpapers used to quantify the proposed \$24.9 base level of off-system sales.
34. Provide the Company's forward price curves (future market price projections) for off-system sales as of June 30, 2004, September 30, 2004, December 31, 2004, March 31, 2005, June 30, 2005, and September 30, 2005. The forward price curves as of these dates should be provided for all projected periods for which they are developed or otherwise obtained. Provide all assumptions underlying these forward price curves, including, but not limited to, natural gas prices.
35. Please provide the Company's actual off-system sales revenues and off-system sales expenses for each month January 2004 through October 2005. Provide all assumptions,

computations and workpapers, including electronic spreadsheets with formulas intact, underlying the computations of the expense amounts.

36. Please provide a copy of the AEP East Interchange Power Statement and Related Data for each month January 2004 through October 2005.
37. Please provide a quantification of the allocation to the Company of AEP margins on the utilization of emission allowances used to supply AEP off-system sales included in the Company's revenue requirement quantification and identify the schedules and line numbers in the Company's filing in which these margins were used to reduce the revenue requirement.
38. Please provide the Company's budgeted/projected off-system sales revenues, off-system sales expenses, and off-system sales margins for November 2005 through December 2006, including the most recent revisions or expectations. Provide all assumptions underlying the budgeted amounts and/or most recent revisions or expectations, data, computations, and workpapers, including electronic spreadsheets with formulas intact, in sufficient detail to understand the basis for and to replicate the Company's quantifications. Separately identify sales to other AEP utilities and to unaffiliated third parties and detail all allocations pursuant to the AEP Interconnection Agreement.
39. Refer to page 37 line 15 through page 38 line 1 of Mr. Wagner's Testimony. Please describe the Company's per books deferred fuel accounting for fuel adjustment clause over or under recoveries of fuel and purchased power expense.
40. Refer to page 39 lines 8-21 of Mr. Wagner's Testimony. Please identify the units, the capacity of each unit, the type of each unit, e.g. gas combined cycle, and the in-service dates of each unit that the Company projects will be added by CSP and APC.
41. Refer to page 39 lines 8-21 of Mr. Wagner's Testimony. Please identify the units, the capacity of each unit, and the retirement date of each unit that the Company projects will be retired by the AEP System.
42. Refer to page 39 lines 8-21 of Mr. Wagner's Testimony. Please provide a copy of all planning documents that AEP relied on to determine its need for building or otherwise acquiring the specific unit additions indicated for CSP and APC.
43. Refer to page 39 lines 8-21 of Mr. Wagner's Testimony. Please provide a copy of all planning documents that AEP relied on to determine that the additional generating capacity (830 mW and 481 mW) should be added to the CSP and APC's "fleets" rather than some other allocation to or among the various AEP utilities.
44. Refer to page 39 lines 8-21 of Mr. Wagner's Testimony. Please provide a copy of the most recent dismantling study and dismantling cost estimate for the retirement of 250 mW of capacity from the AEP fleet.
45. Please identify all generating units retired by AEP in the last 20 years. Identify the capacity of the unit, the fuel type, the scope of the retirement (mothballed, reconfigured, or permanently removed from service), scope of dismantling, if any, and cost of dismantling.
46. Refer to page 38 lines 17-18 of Mr. Wagner's Testimony. Please explain the growth by more than 200 mW in the Company's peak demand in 2005 compared to 2004. In your response,

address to what extent this significant increase was weather related or due to identifiable increases in load from new customers.

47. Please provide the non-coincident peak load and capacity projections for each of the AEP East Companies for each month during 2006 and 2007. Provide a copy of the source document(s) relied on for this purpose.
48. Refer to page 40 lines 15-20 of Mr. Wagner's Testimony. Please provide a ten year history by FERC O&M expense account of the Company's O&M expense associated with each of the Big Sandy units and for Big Sandy in total.
49. Refer to page 40 lines 15-20 of Mr. Wagner's Testimony. Please provide a ten year history of the scheduled outage dates for each of the Big Sandy units. In addition, if the Company separately tracks the cost of each scheduled outage, please provide the O&M expense by FERC O&M expense account for each of the scheduled outages by month.
50. Refer to page 40 lines 15-20 of Mr. Wagner's Testimony. Please describe the historical scheduled outage cycle for each of the Big Sandy units and describe any changes planned to that cycle in 2005 and 2006.
51. Refer to Exhibit EKW-11. Please provide all computational support for column (4), including assumptions, data, computations, and electronic spreadsheets with formulas intact.
52. Refer to page 2 lines 20-23 of Mr. Phillips' Testimony. Please provide a copy of the Audit report referenced and a copy of the Company's written response to the report, including any action plans and timelines that have been developed.
53. Refer to page 4 lines 1-6 of Mr. Phillips' Testimony. Please provide a copy of the Company's current T&D Vegetation Management Program and all related written guidelines.
54. Refer to page 4 lines 1-6 of Mr. Phillips' Testimony. Please provide a redlined copy of the Company's T&D Vegetation Management Program incorporating the changes to the program proposed by the Company.
55. Refer to page 9 line 14 through page 10 line 2 of Mr. Phillips' Testimony. Please provide studies and related cost estimates for the three year cycle proposed by the Company and for any shorter or longer cycles considered by the Company.
56. Please provide a copy of all workpapers in hard copy and in electronic spreadsheet format (with formulas intact) supporting the Company's net salvage percentages and ratios used to develop the proposed depreciation rates for each plant account.
57. Refer to page 8 of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please explain why the Company chose the 15 year period 1990-2004 to determine the net salvage percentages.
58. Refer to page 8 of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please describe the process and application of the decision criteria employed by the Company in using "judgment" to determine the gross salvage and cost of removal percentages for each account.

59. Refer to page 9 of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please provide a copy of the conceptual demolition cost estimate prepared by the Brandenburg Industrial Service Company.
60. Refer to page 9 of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please provide all workpapers, including electronic spreadsheets with formulas intact, that were used to convert the conceptual demolition cost estimate into the net salvage percentages and ratios used to develop the proposed Big Sandy production depreciation rates.
61. Refer to Schedule III of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please provide the same type of information in the same format for the Company's production plant.
62. Refer to Schedule I of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please confirm that the Company actually plans to retire Big Sandy 1 in 2015. Provide all support relied on for this assumption. If the Company does not actually plan to retire Big Sandy 1 in 2015, then please provide the Company's present projection of the retirement year and provide all support relied on for that assumption.
63. Please identify all federal and/or state requirements that will require the Company to retire Big Sandy 1 in 2015, if any. If there are no legal mandates to retire Big Sandy 1 in 2015, then please so state.
64. Refer to Schedule I of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please provide the computations in electronic format (with formulas intact) underlying the average remaining life by plant account for steam production plant.
65. Refer to Schedule I of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please explain the basis for depreciating land rights, including, but not limited to, the basis for the determination of the average remaining life for these assets. If these land rights consist of easements, please confirm that they are perpetual and do not expire.
66. Refer to Schedule I of the depreciation study included as Exhibit JEH-1 to Mr. Henderson's Testimony. Please provide a list of each asset with an original cost at 12/31/04 of \$100,000 or greater. For each of these assets, provide a description of the asset, provide a description of the purpose for which it is used, and identify its physical location.
67. For each asset on the list provided in response to the preceding question, provide the Company's workpapers, including, but not limited to, electronic spreadsheets with formulas intact, for gross salvage percentages, gross cost of removal percentages, and net salvage percentages.

Testimony of KPCO Witness Dennis Bethel

68. With regard to Mr. Bethel's testimony on page 5 at lines 1 through 15, please provide a copy of the FERC Opinion in Docket No. EL04-135-000 reference in the testimony.
69. If not included in the above referenced FERC Opinion, please provide a description or FERC Opinion that describes the "Seams Elimination Cost Allocation ("SECA") calculations.

70. With regard to Mr. Bethel's testimony on page 5 beginning at line 16, please provide the application filed by AEP on March 31, 2005 requesting a two-step increase in PJM transmission rates in the AEP zone.
71. With regard to Mr. Bethel's testimony on page 6 at lines 1 through 8, please provide an explanation and support for the assumption that the Company will receive approximately 75% of the increase proposed by AEP in its PJM transmission rates.
72. With regard to Mr. Bethel's testimony on page 7 at lines 8 through 14, please provide the following information by month for the period January 2004 through the present:
 - a. AEP zonal peak demand
 - b. AEP zonal mWh
 - c. AEP zonal Cooling degree-days, weighted for the AEP zone in a manner consistent with the methodology used by AEP to forecast energy requirements.
 - d. Heating degree-days, weighted across the AEP zone in a manner consistent with AEP's energy forecast methodologies.
73. Please provide 2004 actual monthly point-to-point billing units, applicable rates and total revenues received from point-to-point transaction in the AEP zone.
74. With regard to Mr. Bethel's testimony on page 7 at lines 15 through 23, please provide the support (FERC opinions, etc.) for the statement made that during October and November 2004, PJM was still permitted to charge its Border rate on T&O transactions to MISO. Also provide an explanation for the transitional surcharges that cease to apply in 2005 referred to on line 23.
75. With regard to Mr. Bethel's testimony on page 8 at lines 11 through 12, please provide a quantitative support for the approximate \$170 million per year AEP zone transmission revenue loss.
76. With regard to Mr. Bethel's testimony on page 8 at lines 21 through 23, please provide, for the past five years, the AEP and non-AEP network service peak load (mW) data, as used to determine network service revenue requirement responsibility for AEP and non-AEP customers.
77. Please provide an explanation of the methodology used to develop the "pole-mile percentage allocated share." Is this an FERC approved allocation methodology for certain transmission-related costs? If so, please provide the FERC Opinion approving this methodology.
78. Please provide electronic copy, with all formulas intact, of each of Mr. Bethel's exhibits, BWB-1 through DWB-3 on a CD. Also provide copies of all spreadsheets used to provide data ("populate") each of the referenced exhibits.
79. Please provide supporting workpapers underlying the Company's projections of its MLR and pole-mile allocation factors.

Questions Associated with the Direct Testimony of Robert Bradish

80. Please an electronic copy, with all spreadsheet formulas intact, of Bradish exhibits RWB-1 through RWB-5. Also include all supporting spreadsheets that are used to populate the exhibit spreadsheets.
81. Please provide all supporting workpapers, other than those provided in response to the previous question, used to develop Bradish exhibits RWB-1 through RWB-5.
82. With regard to Exhibit RWB-2, please provide for each projected month in 2006, by month, the mWh by month, by AEP East Operating Company that corresponds to the AEP implicit congestion cost shown in the exhibit. The requested mWh information by month, by AEP Operating Company should correspond to the demand data used to calculate the KPCO MLR projection in Exhibit RWB-2.
83. With regard to Mr. Bradish's testimony on page 8 at lines 1 through 12, please explain the circumstances under which congestion charges collected by PJM meant to fund the FTRs may not equal the FTR revenue targets for the entire PJM region. In particular, please explain the term "FTR revenue targets" as used in the testimony.
84. Is there a specific FERC requirement that AEP's FTR revenues and/or congestion costs be allocated among AEP Operating Companies on the basis of each company's MLR? If not, please provide the authority relied upon by AEP to use an MLR allocation of these revenues and costs.
85. How many nodes are there in the AEP system? Please also provide this information by AEP East Operating Company
86. Please provide the actual AEP load weighted LMP prices by month from October 2004 through the present.
87. Please provide the actual generation output weighted LMP prices for AEP generation sources for the period October 2004 through the present.
88. With regard to the ratemaking treatment of net congestion costs, as discussed on page 11 of Mr. Bradish's testimony at lines 15 through 18, please provide a copy of any State Regulatory Commission Decisions that address this issue in any state in which an AEP East Company operates.
89. With regard to the Company's 2006 forecasted net congestion costs for KPCO, has the Company performed any alternative analysis of the projected net congestion costs using current market prices or any alternative market prices other than the Company's forecasts shown in the Exhibit RWB-2? If so, please provide each such additional forecast developed by the Company, whether relied upon or not for Mr. Bradish's testimony.
90. With regard to Mr. Bradish's testimony on page 13 at lines 5 through 14, please explain how the ECAR operating reserves are currently included in existing KPCO rates. In this explanation, please provide the ratemaking treatment of the costs, both fixed and variable, associated with meeting the ECAR operating reserves. In particular, please identify any such costs that are included in base rates and provide the FERC account in which these costs are included. Also indicate whether or not any of these costs are included in the Company's fuel adjustment

clause and, if so, identify the FERC account in which such costs (ECAR operating reserve) are included.

91. With regard to Mr. Bradish's testimony on page 13 at lines 21 and 22, please provide an explanation for the statement "the additional need takes into consideration the existence of the ECAR operating reserves." Please explain the interaction between meeting ECAR operating reserve requirements and the dispatch of the Company's generation by PJM. Does PJM specifically dispatch AEP generation under a constraint that requires it to meet specific ECAR operating reserves? Please provide a detailed explanation of the response, in addition to a yes or no.

Questions Associated with Cost of Service

92. Please provide a functioning electronic copy of the model used to produce the cost of service study shown in Foust Exhibit LCF-1. If the model is a spreadsheet model, provide the model with all formulas intact. If there are supporting spreadsheets linked to the model, provide all supporting spreadsheets.
93. Please provide the source data and all workpapers supporting the development of the cost of service allocators shown on Exhibit LCF-1, Pages 11 through 20.
94. Please provide, for each rate class, the class maximum diversified demand (class group peak demand) by month at the meter and at the transmission (or generator) voltage level. For rate classes (such as IP) that have customers that take service at different voltages, provide the data delineated by metered voltage level. For example, for rate class IP, provide the secondary, primary, sub-transmission and transmission customer demands at the meter and at the transmission (or generator) voltage level coincident with the monthly IP class maximum diversified demand.
95. For all allocators and line items in the cost of service study which are developed by formula internal to the model, please provide the formula which calculates the line item or allocator.
96. If not provided in response to the previous data request, please provide all workpapers supporting the development of the monthly coincident peaks by rate class, including adjustments from load research sample data to adjusted test year data, and any other adjustments to census class data.
97. Please provide the loss factors used for each rate class and voltage level to adjust the class demands and energy from meter level to the voltage levels used for cost allocation purposes.
98. Please provide the loss study which was used to develop the loss factors referenced in the previous data request.
99. Please provide all electronic spreadsheets supporting Roush Exhibit DMR-2, with formulas intact.
100. Please explain what criteria were used by the Company in determining that the appropriate subsidy reduction was 10% (Roush page 7).
101. Please provide all workpapers supporting the development of the proposed voltage differentials in the Q.P. and C.I.P.-T.O.D. rates.