

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 19 2006

PUBLIC SERVICE
COMMISSION

In The Matter Of:

JOINT APPLICATION OF KENTUCKY POWER)
COMPANY AND KENTUCKY ASSOCIATION FOR)
COMMUNITY ACTION, INC. FOR THE) CASE NO. 2006-00373
ESTABLISHMENT OF A HOME ENERGY)
ASSISTANCE PROGRAM)

ATTORNEY GENERAL'S
INITIAL DISCOVERY REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Initial Request for Information to Kentucky Power Company to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

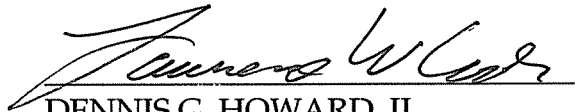
(7) If the Joint Applicants have objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(10) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response.

Respectfully submitted,
GREGORY D. STUMBO
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "Dennis G. Howard, II", written over a horizontal line.

DENNIS G. HOWARD, II
ELIZABETH B. BLACKFORD
LAWRENCE W. COOK
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE
SUITE 200
FRANKFORT KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315

Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Beth O'Donnell, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

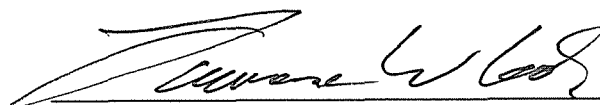
Hon. Mark R. Overstreet
Attorney At Law
Stiles & Harbison
P.O. Box 634
Frankfort, KY 40602-0634

Joe F. Childers
201 W. Short St.
Ste. 310
Lexington, KY 40507

Mr. Thomas "Kip" Bowmar
Executive Director
Kentucky Association for
Community Action
101 Burch Ct.
Frankfort, KY 40601

Errol K. Wagner
Director, Regulatory Services
American Electric Power
P. O. Box 5190
Frankfort, KY 40602

This 19th day of October, 2006.



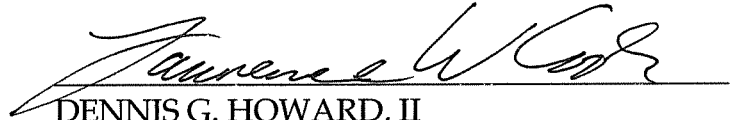
LAWRENCE W. COOK
ASSISTANT ATTORNEY GENERAL

**Attorney General's Initial Request for Information
to Kentucky Power Company
Case Number 2006-00373**

1. Describe in full the policy rationale for permitting Kentucky Power ["KP"] customers who do not use electricity as their primary heating source to participate in KP's HEA plan.
2. State whether KP customers who do not use electricity as their primary heating source will be required to use their HEA assistance payments solely for payment of their KP bill. Please include in your response a detailed description of any and all measures that the KP plan has in place to insure that HEA payments to such customers will be used solely for payment of their KP bill.
3. Under KP's proposed plan, could a KP customer who does not use electricity as his/her primary heating source ever be eligible for an assistance payment where the amount owing on his / her bill is less than the monthly maximum amount of assistance given? If so, what happens to assistance funds not used to meet that month's bill?
4. Describe in full the policy rationale for applying the HEA assistance payment to arrearages.
5. Will HEA program payments go solely toward the participants' arrearage, or will at least a portion of each HEA plan payment go toward the participants' current usage bill?
6. Will scheduled repayment plans for arrearages precede or accompany application of the assistance payment toward arrearages?

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL

A handwritten signature in black ink, appearing to read "Lawrence W. Cook", is written over a horizontal line.

DENNIS G. HOWARD, II
ELIZABETH E. BLACKFORD
LAWRENCE W. COOK
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DRIVE,
SUITE 200
FRANKFORT KY 40601-8204
(502) 696-5453
FAX: (502) 573-8315