

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

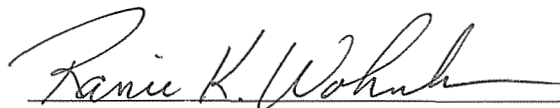
THE APPLICATION OF KENTUCKY POWER COMPANY FOR:)
(1) A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY)
AUTHORIZING THE TRANSFER TO THE COMPANY OF AN)
UNDIVIDED FIFTY PERCENT INTEREST IN THE MITCHELL)
GENERATING STATION AND ASSOCIATED ASSETS; (2) APPROVAL)
OF THE ASSUMPTION BY KENTUCKY POWER COMPANY OF)
CERTAIN LIABILITIES IN CONNECTION WITH THE TRANSFER OF)
THE MITCHELL GENERATING STATION; (3) DECLARATORY) CASE NO. 2012-00578
RULLINGS; (4) DEFERRAL OF COSTS INCURRED IN CONNECTION)
WITH THE COMPANY'S EFFORTS TO MEET FEDERAL CLEAN AIR)
ACT AND RELATED REQUIREMENTS; (5) FOR ALL OTHER)
REQUIRED APPROVALS AND RELIEF)

KENTUCKY POWER COMPANY SUPPLEMENTAL RESPONSE TO
KIUC SUPPLEMENTAL DATA REQUESTS ITEM NO. 36

April 22, 2013

VERIFICATION

The undersigned, Ranie K. Wohnhas, being duly sworn, deposes and says he is the Managing Director Regulatory and Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the forgoing responses for which he is the identified witness and that the information contained therein is true and correct to the best of his information, knowledge, and belief



Ranie K. Wohnhas

COMMONWEALTH OF KENTUCKY)
) CASE NO. 2012-00578
COUNTY OF FRANKLIN)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Ranie K. Wohnhas, this the 15th day of April 2013.



Judy K. Loggert 481393
Notary Public

My Commission Expires: January 23, 2017

Kentucky Power Company

REQUEST

Refer to the Company's response to KIUC 1-52, which states there "has been no attempt to sell the Mitchell generating units or the entire plant to non-affiliated entities during the last three years." Please explain why not. In addition, please provide all documents that address the disposition of the Mitchell units prepared within the last three years, including, but not limited to, studies, analyses, and correspondence, including emails.

RESPONSE

The Company objects to this request to the extent it seeks communications and documents protected by the attorney-client privilege and/or the attorney work-product doctrine.

The Company further objects to this request to the extent it seeks all documents that address the disposition of the Mitchell Units prepared within the last three years, as such request is overly broad and unduly burdensome, as it purports to require a search of documents involving potentially thousands of employees and corporate records, and their review concerning confidentiality and privilege. On March 20, 2013, the Company received the documents identified in the key word scan for documents of the individuals listed in this response. Nearly 60,000 documents were identified as being potentially responsive to this request.

Without waiving its objections, the Company states as follows:

The Company is searching the electronic files of the following individuals for responsive documents:

Robert Powers - EVP and COO - AEPSC
Mark McCullough - EVP Generation - AEPSC
Richard Munczinski - SVP Regulatory Services - AEPSC
Philip Nelson - Managing Director, Regulatory Pricing & Analysis - AEPSC
Greg Pauley - President and COO - Kentucky Power Company

KPSC Case No. 2012-00578
KIUC's Supplemental Set of Data Requests
Dated March 8, 2013
Item No. 36
Page 2 of 2
Supplemental Response filed April 22, 2013

Ranie K. Wohnhas, Managing Director, Regulatory and Finance, Kentucky Power Company

In addition to the document produced with this response, KIUC 2-36 Attachment 1, Kentucky Power will produce non-privileged documents responsive to this request as soon as they are available, with confidential information protected pursuant to Commission rules.

The Company further states that the Mitchell generating units are currently used by the east operating companies under the Interconnection Agreement. The Mitchell units are base load, environmentally controlled units. Kentucky Power and Appalachian Power Company (APCo) are in need of capacity and base load energy. Therefore, no attempt was made to sell the Mitchell generating units to non-affiliated entities. As discussed in the testimony of Company witnesses Pauley and Weaver, the transfer of 50% of the Mitchell units is the least cost option for meeting the Company's long-term capacity and energy requirements. See also the FERC filing made on behalf of Kentucky Power and other AEP Companies (Application, page 8, footnote 7).

See the Company's responses to PSC 1-21, SC 1-4, and KIUC 1-102.

March 28, 2013 Supplemental Response

The Company reiterates its objections above. Please see the enclosed CDs of all responsive, non-privileged documents responsive to this request that were identified as of 1:00 p.m., March 28, 2013. Kentucky Power continues its review of the electronic records of the individuals identified above, and will produce all remaining non-privileged documents responsive to this request as soon as they are available.

April 22, 2013 Supplemental Response

The Company reiterates its objections above. Please see the enclosed CD for all responsive, non-privileged documents responsive to this request that were identified between 1:00 p.m., March 28, 2013 and 10:00 a.m., April 22, 2013. Kentucky Power continues its review of the electronic records of the individuals identified above, and will produce all remaining non-privileged documents responsive to this request as soon as they are available.

WITNESS: Ranie K Wohnhas