

August 28, 2015

Mark R. Overstreet
(502) 209-1219
(502) 223-4387 FAX
moverstreet@stites.com

HAND DELIVERED

Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

RECEIVED
AUG 28 2015
PUBLIC SERVICE
COMMISSION

RE: Case No. 2015-00136

Dear Derouen:

Please find and accept for filing the original and five copies of Kentucky Power Company's:

- (a) non-confidential responses to Staff's August 12, 2015 Second Request for Information to the Company;
- (b) motion for confidential treatment of the Company's response to KPSC 2-1 and accompanying sealed confidential response;
- (c) motion for leave to file an amended answer; and
- (d) tendered amended answer.

I am filing an original and five of the motion for leave to file an amended answer and tendered answer in conformity with the Commission's request for an original and five copies of the data request responses. Please let me know if additional copies of the motion and tendered answer are required.

A copy of the redacted and unredacted response is being served on the Morrisons along with a copy of this letter.

Please do not hesitate to contact me if you have any further questions.

Jeff R. Derouen
August 28, 2015
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Very truly yours,

Mark R. Overstreet

A handwritten signature in blue ink, appearing to read "Mark R. Overstreet". The signature is stylized with large, sweeping loops and a long horizontal flourish at the bottom.

MRO

cc: Mr. and Mrs. Morrison

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

Douglas and Sylvia Morrison)	
)	
)	
Complainants)	
v.)	Case No. 2015-00136
)	
Kentucky Power Company)	
)	
)	
Defendant)	

Motion For Leave To File An Amended Answer

Kentucky Power Company moves the Public Service Commission of Kentucky for an Order granting it leave to file the tendered amended answer to the complaint herein. In support thereof Kentucky Power states:

1. Subsequent to filing its answer, and in connection with its further investigation to provide answers to Staff's August 12, 2015 data requests, the Company determined that paragraph 5 of its answer was incomplete. Accordingly, the Company respectfully requests leave to file its amended answer supplementing paragraph 5 of its May 15, 2015 answer by adding subparagraph 5(p):

(p) When the Company's service technician, Kevin Brown, viewed the lamp affixed to the Complainants' outbuilding on March 26, 2015 he noted a blue-colored extension cord running from the Complainants' residence to the lamp affixed to the outbuilding. The cord exited the residence and was affixed to the back of the Complainants' residence. The cord spanned the distance between the residence and outbuilding at a height of approximately eight feet. As viewed by Mr. Brown, the cord entered the outbuilding and then exited the outbuilding

and ran up the arm of the lamp affixed to the outbuilding. Such an installation is not provided by the Company.

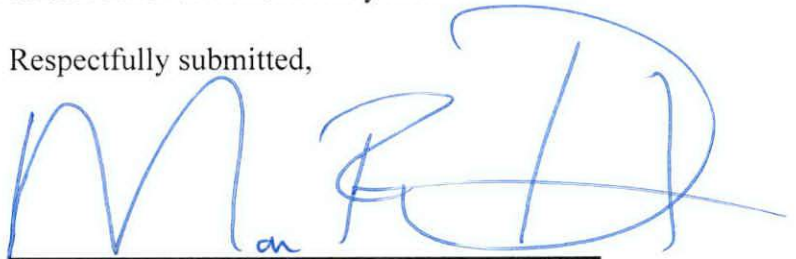
2. For clarity, the amended answer also changes the internal references in the amended answer from “answer” to “amended answer.”

3. Granting leave to file the tendered amended answer will provide the Commission with a more complete understanding of the facts underlying the Complaint and will not prejudice the Complainants. No hearing date has been established in this matter.

WHEREFORE, Kentucky Power Company respectfully requests the Commission to enter an Order:

1. Granting Kentucky Power leave to file the tendered Amended Answer; and
2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,



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

COUNSEL FOR KENTUCKY POWER
COMPANY

Certificate of Service

I hereby certify that a copy of the foregoing motion and tendered amended answer was mailed United States First Class Mail, postage prepaid, this 28th day of August, 2015 to:

Douglas Morrison
Sylvia Morrison
440 31st Street
Ashland, Kentucky 41101

A handwritten signature in blue ink, consisting of a large 'M', a smaller 'R', and a large 'O' with a horizontal line through it, followed by a small 'an'.

Mark R. Overstreet