

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

NORTHEAST KENTUCKY REGIONAL)	
INDUSTRIAL AUTHORITY, INC.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2003-00279
)	
KENTUCKY POWER COMPANY D/B/A)	
AMERICAN ELECTRIC POWER)	
)	
DEFENDANT)	

FIRST DATA REQUEST OF COMMISSION STAFF TO
NORTHEAST KENTUCKY REGIONAL INDUSTRIAL AUTHORITY, INC.

Northeast Kentucky Regional Industrial Authority, Inc. (Northeast Kentucky), pursuant to 807 KAR 5:001, is requested to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due not later than 10 days from the date of this request. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. Provide a map of Sites A and B, identifying the facilities that Kentucky Power d/b/a American Electric Power (Kentucky Power) has installed or is expected to install at Northeast Kentucky s East Park industrial park.

2. Refer to Northeast Kentucky s Formal Complaint, Count I.

a. Did Northeast Kentucky receive itemized invoices from Kentucky Power for the \$187,352.00 charge to install the 34.5 KV overhead electrical distribution to the rear of Site B and the \$90,892 charge to install 53 NE 400-watt HPS street lights with underground service to Site B?

b. If yes, provide copies of the invoices.

c. If no, provide a detailed explanation of Northeast Kentucky s understanding of the composition of the two charges.

d. Provide the documentation referenced in the fifth paragraph of Count I, which Northeast Kentucky states will support the statements set forth in its complaint.

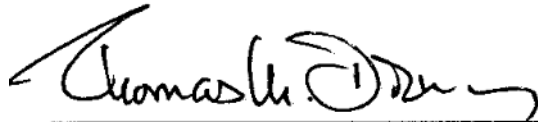
e. Northeast Kentucky states that the amounts paid in reference to Site B violate KRS 278.170. KRS 278.170(1) states that no utility shall, as to rates or service, give any unreasonable prejudice or disadvantage, or establish or maintain any unreasonable difference between localities or between classes of service for doing a like and contemporaneous service under the same or substantially the same conditions. Provide a detailed comparison of the service, cost, and conditions for the work performed by Kentucky Power to Sites A and B which supports the claim that the amounts paid in reference to Site B violate this statute.

3. Refer to Count II of the Formal Complaint.

a. What is the status of the unfinished work referenced in the complaint?

b. Northeast Kentucky asserts in its complaint that Kentucky Power owes Northeast Kentucky interest on the cost for the installation from the time of payment until the project is completed. What interest rate does Northeast Kentucky believe to be appropriate?

4. Refer to page 2, the last sentence in paragraph 2 of Kentucky Power's response to Northeast Kentucky's complaint. Kentucky Power states that the entire amount advanced by Northeast Kentucky under the agreement between Kentucky Power and Northeast Kentucky for Site A has been refunded. Does Northeast Kentucky agree with this statement? If no, explain in detail.



Thomas M. Dorman
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED: October 1, 2003

cc: Parties of Record