

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

**AN EXAMINATION OF THE
APPLICATION OF THE FUEL
ADJUSTMENT CLAUSE OF KENTUCKY
POWER COMPANY FROM
NOVEMBER 1, 2013 THROUGH
APRIL 30, 2014**

CASE NO. 2014-00225

KENTUCKY POWER COMPANY'S DATA REQUESTS TO INTERVENORS
KIUC AND THE ATTORNEY GENERAL

* * * * *

Pursuant to the Commission's Order dated August 27, 2014, Kentucky Power Company propounds the following data requests to be answered by the Attorney General and by Kentucky Industrial Utility Customers, Inc. and each of its members participating in this proceeding:

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 or 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 Intervenor'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. "Identify" used in a fashion other than as described in instructions 3-6 above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.

8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.

10. 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.

11. "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 data request 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.

12. "Attorney General" means the Attorney General of the Commonwealth of Kentucky by and through his Office of Rate Intervention.

13. "KIUC" means Kentucky Industrial Utility Customers, Inc., its employees, agents, its members identified in this proceeding; Air Products and Chemicals, Inc., Air Liquide Large Industries U.S. LP, AK Steel Corporation, EQT Corporation, and Catlettsburg Refining LLC, a subsidiary of Marathon Petroleum LP, J. Kennedy and Associates, Inc., Lane Kollen, and Philip Hayet

14. "Intervenors" means collectively the Attorney General and KIUC.

15. "PJM" means PJM Interconnection.

16. "Company" means Kentucky Power Company.
17. "AEP" means American Electric Power Company, Inc.

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 data requests are continuing in nature, and, without regard to the date created or obtained, 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 Power. Any studies, evaluations, analyses, 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 data request should be construed independently and not with reference to any other data request 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 data request, 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 data request 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. Please furnish any non-disclosure or other agreement required for disclosure of any information or response for which confidential treatment is provided.

Data Requests

1. Please refer to the testimony of Mr. Hayet and the table at page 14, line 6 and above, titled "Allocation \$/MWh By Method:"
 - (a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied

upon by Mr. Hayet to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Hayet in calculating the values appearing in the table.

(c) Please identify any assumptions made by Mr. Hayet in developing this table.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

2. Please refer to the testimony of Mr. Hayet and the table at page 16, line 11 and above, titled "Allocation of Fuel Costs and Purchase Power By Method:"

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Hayet in calculating the values appearing in the table.

(c) Please identify any assumptions made by Mr. Hayet in developing this table.

(d) Please identify and explain why, including any assumptions or any documents or studies supporting such explanation, the total fuel costs for each month are different between the "Kentucky Power Company Filing" portion of the table and the "Hourly Restack (EKPC Method) Summarized Monthly" portion of the table.

(e) Please provide the detailed basis, including any documents or studies supporting such assumption, for each assumption identified in the response to subpart (c) and (d) of this data request.

(f) To the extent not provided in response to subpart (e) of this data request, please identify and provide each source for the values appearing in the table.

3. Please refer to the testimony of Mr. Hayet and the table at page 15, line 10 and above, titled "Allocation \$/MWh by Method:"

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Hayet in calculating the values appearing in the table.

(c) Please identify any assumptions made by Mr. Hayet in developing this table.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

4. Please refer to the testimony of Mr. Hayet, page 9, lines 8-9, where he states "it is also contrary to how all of the other utilities in Kentucky operate under the uniform FAC regulations."

(a) Please identify all facts relied on by Mr. Hayet in making this statement.

(b) Please identify and provide a copy of all documents supporting Mr. Hayet's statement.

(c) Please identify each individual (other than counsel for KIUC or the Attorney General) with whom Mr. Hayet, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry (other than counsel for KIUC or the Attorney General), or employees, attorneys or representatives of the Attorney General (other than counsel for KIUC or the Attorney General), communicated with regarding this statement and detail the substance of those communications.

(d) Please provide, to the extent not provided in response to subpart (c), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between "all other utilities in Kentucky" on the one hand, and Mr. Hayet, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys and representatives of the Attorney General, on the other, in any way relating to this statement.

5. Please refer to the testimony of Mr. Hayet, page 11, lines 3-5, where he states that "the sum of the minimum capacity of the Company's online resources exceeded native load for more than 31% of the hours in the four month period of January through April 2014."

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied

upon by Mr. Hayet to develop this testimony. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please identify any assumptions made by Mr. Hayet in developing this testimony.

(c) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (b) of this data request.

6. Please refer to Mr. Hayet's statement beginning at Page 4, line 4 of his testimony in which he testifies "The use of the EKPC allocation methodology results in a FAC reduction to Kentucky Power's native load customers during the first four months of 2014 of approximately \$12.6 million."

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet in computing the \$12.6 million value. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. in computing the \$12.6 million value.

(c) Please identify any assumptions made by Mr. Hayet in computing the \$12.6 million value.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values used in computing the \$12.6 million value.

7. Please refer Mr. Hayet's statement beginning on Page 8, line 4 of his testimony "But generation dispatch and fuel cost allocation to ensure that the FAC rate is reasonable are two completely different matters."

(a) Please provide all regulatory orders, handbooks, treatises or other studies or documents relied upon by Mr. Hayet in making the identified statement.

(b) To the extent not provided in response to subpart (a) of this data request please provide all facts and other bases relied upon by Mr. Hayet in making the identified statement.

8. Please refer to Mr. Hayet's testimony beginning at Page 13, line 11 in which he stated: "No, the fuel cost results that the Company provided included the allocation of fuel costs

to native load customers and did not include fuel costs or loads associated with the wholesale requirements customers (Vanceburg and Olive Hill).”

(a) Please identify the data request response or other source by which Mr. Hayet claims Kentucky Power provided the indicated fuel costs results.

(b) To the extent the source of the indicated fuel cost result is not a response by Kentucky Power to a data request in this proceeding, please provide all documents comprising the indicated fuel cost results or otherwise relied upon by Mr. Hayet in making the statement.

9. To the extent not previously requested and provided, please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Hayet with respect to any calculations or quantified values in his testimony. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(a) Please identify any assumptions made by Mr. Hayet in developing or making the identified calculation or quantified value.

(b) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (a) of this data request.

(c) To the extent not provided in response to subpart (b) of this data request, please identify and provide each source for the values used in the identified calculations.

10. Please refer to the testimony of Mr. Kollen, pages 17-18 regarding the fuel cost allocation methodology allegedly utilized by East Kentucky Power Cooperative (“EKPC”).

(a) Please identify and provide a copy of all documents or studies supporting Mr. Kollen’s interpretation of EKPC’s fuel allocation methodology.

(b) Please identify any employees, attorneys, or other representatives of EKPC with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated with regarding EKPC’s fuel allocation methodology and detail the substance of those communications.

(c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of EKPC on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General on the other, in any way relating to EKPC’s fuel allocation methodology.

(d) Please identify all Commission Orders specifically approving EKPC's fuel cost allocation methodology described by Mr. Kollen on pages 17-18 of his testimony.

11. Please refer to the testimony of Mr. Kollen, page 18 regarding the fuel cost allocation methodology allegedly utilized by Duke Energy Kentucky, Inc. ("Duke").

(a) Please identify and provide a copy of all documents supporting Mr. Kollen's interpretation of Duke's fuel allocation methodology.

(b) Please identify all attorneys, employees or other representatives of Duke with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated regarding Duke's fuel allocation methodology and detail the substance of those communications.

(c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of Duke on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General on the other, in any way relating to Duke's fuel allocation methodology.

(d) Please identify all Commission Orders specifically approving Duke's fuel cost allocation methodology described by Mr. Kollen on page 18 of his testimony.

12. Please refer to the testimony of Mr. Kollen, page 18 regarding the fuel cost allocation methodology allegedly utilized by Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities Company ("KU").

(a) Please identify and provide a copy of all documents supporting Mr. Kollen's interpretation of LG&E & KU's fuel allocation methodology.

(b) Please identify all attorneys, employees or other representatives of LG&E or KU with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated regarding LG&E & KU's fuel allocation methodology and detail the substance of those communications.

(c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of KU or LG&E on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General on the other, in any way relating to KU or LG&E's fuel allocation methodology.

(d) Please identify all Commission Orders specifically approving LG&E & KU's fuel cost allocation methodology described by Mr. Kollen on page 18 of his testimony.

13. Please refer to the testimony of Mr. Kollen, page 18 regarding the fuel cost allocation methodology allegedly utilized by Big Rivers Electric Corporation ("Big Rivers").

(a) Please identify and provide a copy of all documents supporting Mr. Kollen's interpretation of Big Rivers' fuel allocation methodology.

(b) Please identify all attorneys, employees, or other representatives of Big Rivers with whom Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General, communicated regarding Big Rivers' fuel allocation methodology and detail the substance of those communications.

(c) Please provide, to the extent not provided in response to subpart (a), a copy of all communications, including documents, memoranda, recordings or notes relating thereto, between representatives of Big Rivers on the one hand, and Mr. Kollen, or representatives, employees or principals of J. Kennedy and Associates, Inc., or attorneys, representatives, or employees of Boehm, Kurtz and Lowry, or employees, attorneys or representatives of the Attorney General on the other, in any way relating to Big Rivers' fuel allocation methodology.

(d) Please identify all Commission Orders specifically approving Big Rivers' fuel cost allocation methodology described by Mr. Kollen on page 18 of his testimony.

14. Please refer to the testimony of Mr. Kollen, Exhibit LK-3:

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this exhibit. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps used by Mr. Kollen in calculating the values in this exhibit.

(c) Please identify any assumptions made by Mr. Kollen in developing this exhibit.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request please identify all sources of data used by Mr. Kollen in developing this exhibit.

15. Please refer to the testimony of Mr. Kollen, Exhibit LK-7:

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied

upon by Mr. Kollen to develop this exhibit. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps used by Mr. Kollen in calculating the values in this exhibit.

(c) Please identify any assumptions made by Mr. Kollen in developing this exhibit.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request please identify all sources of data used by Mr. Kollen in developing this exhibit.

16. Please refer to the testimony of Mr. Kollen, Exhibit LK-8:

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this exhibit. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps used by Mr. Kollen in calculating the values in this exhibit.

(c) Please identify any assumptions made by Mr. Kollen in developing this exhibit.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request please identify all sources of data used by Mr. Kollen in developing this exhibit.

17. To the extent not previously requested and provided, please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen with respect to any calculations or quantified values in his testimony. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(a) Please identify any assumptions made by Mr. Kollen in developing or making the identified calculation or quantified value.

(b) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (a) of this data request.

(c) To the extent not provided in response to subpart (b) of this data request, please identify and provide each source for the values used in the identified calculations.

18. Please refer to Mr. Kollen's statement beginning at Page 6, line 4 of his testimony in which he testifies "I recommend the Commission order Kentucky Power to refund over a six month period \$12.648 million in excessive fuel costs"

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen in computing the \$12.648 million value. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Kollen in computing the \$12.648 million value.

(c) Please identify any assumptions made by Mr. Kollen in computing the \$12.648 million value.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values used in computing the \$12.648 million value.

19. Please refer to Mr. Kollen's calculation, beginning at Page 6, line 6 of his testimony, of the claimed "\$0.864 million in interest through December 31, 2014 calculated at the Company's weighted cost of capital."

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen in computing the \$0.864 million value. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Kollen in computing the \$0.864 million value.

(c) Please identify any assumptions made by Mr. Kollen in computing the \$0.864 million value.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values used in computing the \$0.864 million value.

(f) Please provide Mr. Kollen's basis for using the Company's weighted cost of capital in calculating the interest claimed due, including, but not limited to, all statutes, regulations, and orders of the Public Service Commission of Kentucky relied upon by Mr. Kollen in doing so.

20. Please refer to the testimony of Mr. Kollen and the table at Page 14, line 1 and above:

(a) Please provide all spreadsheets, work papers, calculations, and analyses, and all calculations relating to, consulted, or reviewed, that were performed, consulted or relied upon by Mr. Kollen to develop this table. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(b) Please describe in detail the computational steps, if any, used by Mr. Kollen in calculating the values appearing in the table.

(c) Please identify any assumptions made by Mr. Kollen in developing this table.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

21. Please refer to the statement beginning at Page 26, line 16 of Mr. Kollen's testimony where Mr. Kollen states: "If the other minimum segment fuel costs from Mitchell were included the projected rate increase would be even greater."

(a) Please identify each "minimum segment fuel cost" that was not included and Mr. Kollen's basis for stating that the "minimum segment fuel cost" could or should be included.

(b) Please provide all calculations or other basis relied upon by Mr. Kollen in making the identified statement. The requested information should be provided by unit, on an hour by hour basis, and in an electronic format, with formulas intact and visible, and no pasted values.

(c) Please identify any assumptions made or relied upon by Mr. Kollen in reaching the conclusion made in the identified statement.

(d) Please provide the detailed basis, including any documents or studies supporting each such assumption, for each assumption identified in the response to subpart (c) of this data request.

(e) To the extent not provided in response to subpart (d) of this data request, please identify and provide each source for the values appearing in the table.

22. To the extent not previously provided, please provide a copy of any documents, including regulatory orders where Kentucky Power was not a party, Mr. Kollen relied upon or otherwise consulted in developing his testimony. In lieu of a hard copy of a document it is acceptable to provide a live, working, and tested link to the specific document.

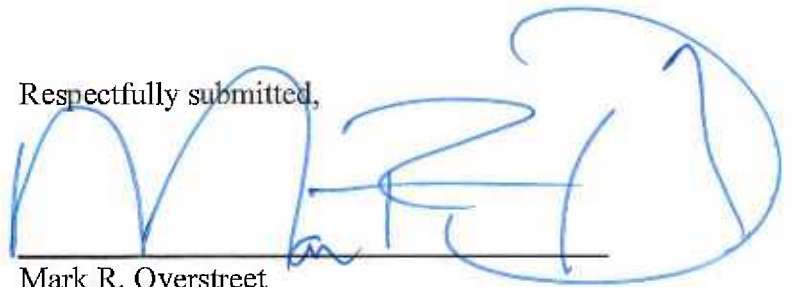
23. Please identify and produce any exhibits, demonstrative aids, or summaries (as the term is used at Kentucky Rule of Evidence 1006) that the Attorney General or Kentucky Industrial Utility Customers, Inc. intend to introduce or use during the course of the hearing in this matter. This is a continuing request and the response should be promptly supplemented.

(a) For each such exhibit, demonstrative aid, or summary summaries (as the term is used at Kentucky Rule of Evidence 1006) please identify the source of all information therein

(b) To the extent the source is not part of the record of this proceeding please provide a copy of the document or source.

(c) To the extent the source is part of the record of this proceeding please identify where in the record the information may be found by data request response number, witness, page and line of testimony, or otherwise.

Respectfully submitted,



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COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed using the Public Service Commission of Kentucky's electronic filing service, which will send an e-mail message to

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this 17th day of October 2014.

A handwritten signature in blue ink, appearing to read 'M R O', is written over a horizontal line. The signature is stylized and somewhat cursive.

Mark R. Overstreet