

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

The Application of Kentucky Power Company for: )  
(1) A General Adjustment of Its Rates for Electric )  
Service; (2) An Order Approving Its 2014 ) Case No. 2014-00396  
Environmental Compliance Plan; (3) An Order )  
Approving Its Tariffs and Riders; and (4) An Order )  
Granting All Other Required Approvals and Relief )

**KENTUCKY POWER COMPANY'S DATA REQUESTS TO KENTUCKY  
INDUSTRIAL UTILITY CUSTOMERS, INC.**

\* \* \* \* \*

Pursuant to the Commission's Order dated January 13, 2015, Kentucky Power Company propounds the following data requests to be answered by Kentucky Industrial Customers, Inc. and each 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 of 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 KIUC'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 interrogatory 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. "KIUC" means Kentucky Industrial Utility Customers, Inc., its employees, agents, and its members identified in paragraph 1 of its November 20, 2014 petition to intervene in this proceeding, Paul A. Coomes, Lane Kollen, Richard A. Baudino, Stephen J. Baron, and J. Kennedy and Associates, Inc.
13. "PJM" means PJM Interconnection.
14. "Company" means Kentucky Power Company.
15. "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 interrogatories 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 interrogatory should be construed independently and not with reference to any other interrogatory 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 interrogatory, 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 interrogatory 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 required for disclosure of any information or response for which confidential treatment provided.

## **Data Requests**

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Kollen in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Kollen. The requested information, if so available,

should be provided in an electronic format, with formulas intact and visible, and no pasted values.

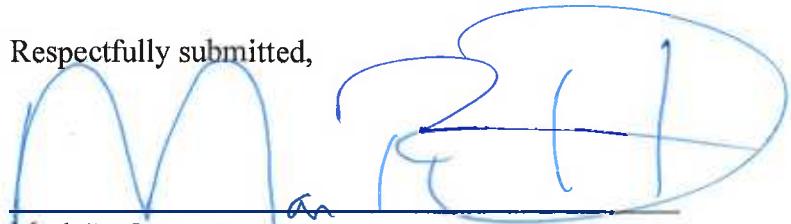
3. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Baron in electronic format, with formulas intact and visible, and no pasted values.
4. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baron. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Baudino in electronic format, with formulas intact and visible, and no pasted values.
6. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baudino. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
7. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Dr. Coomes in electronic format, with formulas intact and visible, and no pasted values.
8. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Dr. Coomes. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
9. Please reference Exhibit LK-9, page 3 of 3, of the testimony of Company Witness Kollen, specifically the numbers used for the Plant in Service total, which reference Schedule B-2.
  - a. Confirm that the Plant in Service values used in Exhibit LK-9, page 3 of 3, which reference Schedule B-2, were not those provided by the Company in this proceeding.
  - b. If you cannot confirm the statement in subpart a, please explain the basis for your inability to confirm.
  - c. Please update Exhibit LK-9 and any other exhibits, schedules, calculations, statements, or other positions in which Mr. Kollen used or relied on calculations using values other than those provided by the Company. This includes updating all adjustments that used Mr. Kollen's gross up conversion factor as well as Mr. Kollen's overall recommendation.
10. Please reference page 9 of the testimony of Mr. Kollen.

- a. Please identify the units on the Y-axis of the chart shown on that page titled "Kentucky Power Co. Total Rates Charged to Kentucky Customers 2004-2013."
  - b. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of this chart. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
11. Please reference page 42 of the testimony of Mr. Kollen. Please provide all workpapers, source documents, and electronic spreadsheets used in the calculation of Mr. Kollen's proposed \$0.832 million adjustment to the Company's proposed OSS base credit. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
12. Please reference pages 20-22 of the testimony of Mr. Baron.
  - a. Please confirm that Mr. Barron is proposing that the Company pay customers interruptible credits under tariff CS IRP whether or not the interruptible capacity qualifies as a capacity resource in PJM?
  - b. If you cannot confirm the statement in subpart a, please explain the basis for your inability to confirm.
13. Please reference pages 23 through 27 of the testimony of Mr. Baron.
  - a. Please confirm that the majority of the Company's OATT PJM LSE expense is not within the Company's control and is instead governed by FERC approved tariffs and the revenue requirements of other transmission owners in the PJM RTO.
  - b. If you cannot confirm the statement in subpart a, please explain the basis for your inability to confirm.
14. Please identify all proceedings in Ohio, West Virginia, Virginia, Michigan and Indiana where Mr. Baron provided testimony in opposition to the inclusion of PJM charges and credits in riders.
  - a. Please provide copies of all testimony offered by Mr. Baron in those proceedings.
  - b. Please provide copies of the State Commission Orders in those proceedings where the State Commissions agreed with the testimony of Mr. Baron opposing the inclusion of PJM charges and credits in riders.
  - c. Please confirm that the Company's affiliates in Ohio, West Virginia, Virginia, Michigan, and Indiana, all collect their PJM charges and credits through riders, or track the actual annual PJM charges above and below an amount in base rates.

- d. If you cannot confirm the statement in subpart c, please explain the basis for your inability to confirm.
15. Reference Exhibit RAB-5 of the testimony of Mr. Baudino.
- a. Please provide a list of each firm relied on by Mr. Baudino to develop the median earnings and book value growth rates and the individual growth rate estimates for each firm.
  - b. Please provide a list of each firm relied on by Mr. Baudino to develop the median dividend yield of 0.76% and the individual dividend yield for each firm.
  - c. Please provide all workpapers and supporting documents for the Value Line median growth rates and dividend yields.
  - d. Please indicate how many of the firms included in arriving at the median earnings and book value growth rates pay common dividends.

Respectfully submitted,

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A handwritten signature in blue ink, appearing to read "Mark R. Overstreet". The signature is written over a blue oval shape.

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### Certificate of Service

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 the 6<sup>th</sup> day of April, 2015.

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