1. Reference the response to AG 1-9. Please confirm the exact number of jobs created from the three (3) EAP funded projects listed.

2. Reference the response to AG 1-11. Please confirm that the proposed increase in the customer charge from $8 per month to $16 per month represents a 100% increase.

3. Reference the response to AG 1-18, Attachment 2. Please provide the minutes of all recent and future meetings of the Mitchell Plant Operating Committee and all successors and consider this a continuing request for information during the course of this matter.

   a. Please advise who on the Mitchell Plant Operating Committee in 2014 through the present is a ratepayer of KPCo.
   b. Reference Attachment 2, page 2 of 4, final paragraph. Please provide a copy of the Environmental Compliance Plan referenced therein or indicate where this plan has been produced in the record of this matter.
   c. Reference Attachment 2, page 3 of 4. Please provide a copy of the Transition Plan referenced therein or indicate where this plan has been produced in the record of this matter.

4. Reference the response to AG 1-31.

   a. Has either KPCo, AEP, PJM or NERC identified any reliability or resource adequacy concerns as a consequence of the anticipated closing of the Big Sandy Unit 2? Please provide any and all documents, communications or data relevant to your answer.
   b. Please detail any and all reasons other than "consistency with the PJM planning year", including but not limited to reliability and our resource adequacy, for keeping the Big Sandy Unit 2 active and in service between December 2015 and June 1, 2016.
   c. If Big Sandy Unit 2 was identified as a generation unit necessary for reliability or resource adequacy, would PJM tariffs pending or approved at FERC offer compensation to keep Big Sandy Unit 2 in service beyond June 1, 2016? Please provide any and all documents, communications or data relevant to your answer.

5. Reference the response to AG 1-34.

   a. Please provide information, including copies, of any public statements made, recognition granted or awards made by NERC, PJM, or any other related industry entity regarding AEPSC's cyber security plan and the systems developed in support thereof.
   b. What steps is AEP taking to assure that the AEPSC cyber security plan is cost effective?
   c. Identity all costs by account incurred by AEPSC (1) in total and (2) charged to KPCo, by month for cyber security from January 2011 through December 2014.

6. Reference the response to AG 1-30 (b).

   a. If, as KPCo states, WPCo cannot recover 17.5% of the costs of its 50% ownership interest in the Mitchell plant, identify which entity is paying (or will pay) the 17.5% share of costs.
   b. Are any costs related to the 17.5% of WPCo's 50% interest in the Mitchell plant being charged or allocated to KPCo? If so, please identify, quantify and explain the related KPCo amounts.

7. Reference the response to AG 1-39. Provide copies of any and all dismantling studies of the Mitchell plant performed by any and all "outside engineering professionals."

8. Reference the response to AG 1-44. Will the company submit a filing in which it seeks Commission approval of the pilot program for receiving alerts via text message or email about outages and restoration information?

9. Reference the responses to AG 1-45 (d) and 1-153 through 1-156. Was a Lead-Lag study performed on behalf of KPCo by any other entity, affiliate or consultant? If so:

   a. Provide copies of all such studies, together with the information and in the format set forth in the original question; and
   b. Revise the company responses to AG 1-153, AG 1-154, AG 1-155 and AG 1-156 accordingly.

10. With regard to the response to AG 1-105, provide the complete style of each case, including but not limited to the case number, jurisdiction, and name of the court.

11. Reference the response to AG 1-123. Why has KPCo made it its practice to seek CWIP in its rate base "since at least the early 1980s," as the response indicates? Provide a justification.

12. Reference the response to AG 1-164. With regard to the aviation-related expense set forth in Attachment 1:

    a. Please specify the nature of the use of the aircraft, including:
        i. Was the aircraft used to carry passengers?
        ii. Was the aircraft used for other purposes such as line-related inspections (if so, please specify)?
        iii. Were any KPCo personnel transported, and if so, who (by job title and location)?
        iv. Were AEPSC personnel working on KPCo's behalf transported, and if so, who (by job title and location) and for what specific purpose?
    b. Please provide a break down of the usage by (1) helicopters or (2) fixed-wing aircraft.
    c. For each aircraft please list the aircraft and specify whether each aircraft is (1) company-owned or (2) leased.
    d. Please identify the cost to KPCo in the test year for all charges for AEP owned or leased aircraft that relate to having such aircraft available (i.e., that are not related to the direct use of the aircraft in flights between airports).

13. Reference the response to AG 1-165.

    a. Confirm that for 2014, 8 aircraft trips were made for "KYPCO Leadership Meeting and to Conduct a Crew Visit," but that none of these meetings occurred in Kentucky.
    b. Regarding line items 1620-1625, please identify what "IRC" means.

c. Regarding line items 1796-1797, please confirm that airport code MKY stands for Mackay Airport, Queensland, Australia.
d. Under Column R, "Benefitting Location," identify which location(s) are in Kentucky, and which ones specifically benefit KPCo.

14. Reference the response to AG 1-206. The total annual maintenance expense for the accounts identified in Attachment 1 for the three-year period 2011-2013 is approximately $48.81 million, whereas the total for 2014 is $71.812 million, an increase over the three-year average of approximately 47.13%. Provide a complete explanation for this major increase.

15. Reference the response to AG 1-251 (d), attachment 1. Identify the specific site location(s) and type of plant upon which the removal costs identified therein were spent.

16. Reference the response to AG 1- 308. Would KPCo agree that it could recover its costs by selling the property? Provide copies of any studies the company may have conducted concerning whether the company should sell the property.

17. Reference the response to AG 1-400, Attachment 1 (p. 10) and Attachment 2 (p. 8).

a. Confirm that AEP estimated the impact of bonus depreciation to be, for 2013 [**BEGIN CONFIDENTIAL**] $[redacted] and $ [redacted] [**END CONFIDENTIAL**] in 2014. Provide the estimated benefit of bonus depreciation to KPCo for 2013 and 2014.
b. What impact on ADIT for the test year did the 2013 bonus tax depreciation have? Include detailed calculations.
c. Was the impact of 2013 bonus tax depreciation on ADIT fully reflected in KPCo's filing?
d. If not, explain fully why not and show the amounts of ADIT impact that would need to be made in order to fully reflect the 2013 bonus tax depreciation. Include supporting calculations.
e. What impact on ADIT did the 2014 bonus tax depreciation have? Include detailed calculations.

f. Was the impact of 2014 bonus tax depreciation on ADIT fully reflected in KPCo's filing?
g. If not, explain fully why not and show the amounts of ADIT impact that would need to be made in order to fully reflect the 2014 bonus tax depreciation. Include supporting calculations.

18. Refer to the response to AG 1-175 (a).

a. Did KPCo receive any grants or reimbursement for R&D from any organization for the BS-2 DFGD? If so, please explain and identify the amounts.
b. How were the amounts paid by KPCo for "R&D" to a "consortium" regarding the BS-2 DFGD accounted for by KPCo? Show amounts by account.

19. Refer to the Company's February 18, 2015 supplemental response to Staff 2-40.

a. Identify and provide a complete copy of the KPCo audit completed on February 5, 2015 and accounting work finalized on February 10, 2015 of property accounting work orders since 2008 for the Mitchell Plant.
b. Include the workpapers and Excel files that were used in such audit.
c. What impact did this audit have on KPCO's request for Mitchell plant related costs in the current rate case? Identify, quantify and explain the impact.
d. Which of the attachments to Staff 2-40 contains the revised KPCo Adjustment AJE-3?
e. Please provide the revised KPCo Adjustment AJE-3, and reconcile it to the results shown in the attachments to Staff 2-40. Identify, quantify and explain each reconciling item.

20. Cost of removal. Refer to the response to AG 1-251 (e).

a. Show in detail the amounts recorded for cost of removal by account for each the five years through 2014.
b. Does KPCo record cost of removal in the accumulated depreciation account? If not, explain how KPCo records cost of removal.

c. Does KPCo know how much cost of removal was recorded in its accumulated depreciation account as of any of the following dates:
   (i) The date when KPCo adopted FASB 143?
   (ii) At December 31, 2011?
   (iii) At December 31, 2012?
   (iv) At December 31, 2013?
   (v) At December 31, 2014?
d. If the response to any parts of part c is affirmative, please identify the respective amounts of cost of removal that KPCo had recorded in accumulated depreciation as of each of those dates.
e. If the response to any parts of part c is negative, explain fully why not.
f. How was the cost of removal reflected in the Company's current depreciation rates? Please show in detail.

21. Cash working capital and pension cost. Refer to the response to AG 1-260 (e).

a. Please confirm that the Company has not conducted any working capital study in the past 30 years.
b. Please confirm that the Company cannot locate the last working capital study.
c. In what case was the last working capital study presented?
d. In the case identified in response to part c and in each case subsequent to the case identified in response to part c, answer the following and provide the documents relied upon:
e. What amount of working capital did the Company include in rate base?
f. How much of that working capital amount was for pensions?
g. What amount of pension cost did the Company include in operating expenses?
h. What amount of pension cost was allowed?

22. Interest savings. Refer to the response to AG 1-291 (a).

a. Please answer "yes" or "no" to the following: Was the $1.9 million of long-term interest expense savings reflected in KPCo's filing?
b. If the response to part a is "yes" identify exactly where in KPCo's filing this interest savings is reflected.

c. If the response to part a is "no" explain why this interest savings was omitted from, or not fully reflected in, KPCo's filing.

23. Pension asset. Refer to the response to AG 1-293 (a), (b), (c) and (d).

a. Will KPCo be filing an amended application to attempt to include a pension asset in rate base?
b. If not, explain fully why not.
c. If so, identify when KPCo intends to amend its application for this item.
d. Identify the test year cash contribution for pensions, and for each amount identify the date and amount paid as well as the payee.
e. Referring to the amounts listed in response to part b, identify which of those amounts were "additional".
f. In the Company's filing has capitalization been reconciled to rate base?
g. Identify each item in the Company's adjusted capitalization that is represented by the prepaid pension asset.
h. Has the Company ever included a prepaid pension asset in rate base in any other rate cases before the Kentucky Public Service Commission?
i. If not, explain fully why not.
j. If so, identify each such case, and provide the specific pages from KPCo's filing which show the Company's proposed inclusion of a pension asset in rate base.
k. The response to AG 1-293(d) references the periods going back to 2000. Identify each KPCo rate case from 2000 through 2014.
l. For each rate case identified in response to part g, provide the specific pages from KPCo's filing showing (1) the amount of pension cost requested by the Company and (2) the amount of pension asset in rate base requested by the Company.

24. Transmission revenue requirement. Refer to the response to AG 1-335.

a. Identify, quantify and explain the "true cost of transmission service" as the term is used in the response.
b. Have KPCo's rates in any year prior to 2015 ever reflected the "true cost of transmission service"?
c. If not, explain fully why not.

d. If so, identify each year in which KPCo's reflected the "true cost of transmission service".
e. If the transmission revenue requirement is kept in KPCo's base rates, would that be consistent with historical ratemaking for KPCo in all years through 2014?
f. If the transmission revenue requirement is kept in KPCo's base rates, would the transmission revenue requirement be reviewed in KPCo's next base rate case, along with KPCo's costs for generation and distribution?
g. If not, explain fully why not.
h. What rate of return and cost of equity did KPCo apply to derive the OATT revenue requirement on Exhibit JMS-3, column 10? Explain and show calculations.
i. How much is KPCo's transmission revenue requirement anticipated to change in each year:
   (i) 2015
   (ii) 2016
   (iii) 2017
   (iv) 2018
   (v) 2019
   (vi) 2020

25. Refer to the response to AG 1-339.

a. Does KPCo pay transmission rates to AEP under the AEP OATT?
b. Does KPCo receive transmission revenues?
c. Is there any different between the amounts identified in response to parts a and b?
d. If so, identify the amounts and differences in each year, 2009-2013, and as estimated forecast for each year 2014-2020.
e. When did all load service entities in the AEP Transmission Zone begin paying the same rate for transmission service per the AEP OATT?
f. How many rate cases has KPCo had since the date identified in response to part d?

26. PJM OATT. Refer to the response to AG 1-348 including the supplemental response. Referring to the January 2015 PJM OATT LSE Charges in Attachment 4 to the response and to Attachment 1:

    a. Which of the listed accounts are revenue to KPCo?
    b. Do credit amounts represent net revenues to KPCo? If not, what do the credit amounts represent?
    c. Provide descriptions for each of the subaccounts to account 456 that are used to record PJM OATT LSE charges and revenue.
    d. Provide descriptions for each of the subaccounts to account 565 that are used to record PJM OATT LSE charges.

27. Refer to the responses to AG 1-354 and 1-355.

    a. Has KPCo ever been allowed to include negative amounts in its capital structure in any prior rate cases?
    b. If not, explain fully why not.
    c. If so, identify each prior KPCo rate case in which KPCo was allowed to include negative amounts in its capital structure, and provide the relevant pages from each case.
    d. Why aren't the negative amounts in KPCo's capital structure being eliminated against the amounts listed for common equity?
    e. Isn't the Company's proposed inclusion of negative amounts in the capital structure an indirect way of inflating the common equity return?
    f. Is KPCo or its witnesses aware of any other utility regulated by the Kentucky Public Service Commission that has been allowed to include negative amounts in its capital structure?
    g. If the response to part d is "yes" identify by case and order citation each such instance of which the Company and its witnesses are aware.

28. Rockport. Refer to the response AG 1-389(b).

    a. What fixed charges and demand charges would KPCo propose if the fixed Rockport costs were to be recovered through fixed charges and demand charges? Show how KPCo would develop fixed charge and demand charge rates.

b. Is it KPCo's position that the Rockport fixed costs must be recovered in per-kWh rates in perpetuity with no possibility of regulatory review to apply cost/causation principles? If not, explain fully why not.

29. Rockport. Refer to the response to AG 1-394.

a. Provide a copy of the FERC Approved PPA or UPA which specifies that a 12.16% return in equity is to be used.
b. What is the term of the Rockport PPA/UPA?
c. Has the 12.16% been reviewed in any FERC proceeding since 2005? If so, identify the proceeding.
d. What portion of the Rockport plant is owned by AEG?
e. When did AEG acquire that ownership?
f. Why isn't the AEG owned part of the Rockport plant being transferred to KPCo at net book value, similar to the 50% interest in the Mitchell plant?

30. Vegetation Management, tree trimming, tree removal. Refer to the response to AG 1-14. The response to AG 1-14(a) states that: "If a tree inside of the rights-of-way is larger than 18 inches diameter, then its removal would be capitalized." The Attachment 1 provided in response to AG 1-14(c) has similar criteria.

a. Identify the amounts capitalized in each year, 2009 through 2014 for removing trees growing inside the rights-of-way that were larger than 18 inches in diameter.
b. Identify the total cost of removing trees over 18 inches in diameter in each year, 2009 through 2014.
c. Identify the number of trees over 18 inches in diameter that were removed in each year, 2009 through 2014.
d. Does the Company keep records of its Vegetation Management for removing trees over 18 inches in diameter?
e. If not, explain fully why not.
f. If so, do those records indicate whether such trees were: (1) inside the existing right-of-way? (2) part of a right-of-way widening project? (3) outside of the existing right-of-way and not part of a widening project?

g. If the answer to part (2) in subpart (f), above, is affirmative, please identify the number of over 18-inch diameter trees in each category in each year, 2009-2014.

31. Refer to the response to AG 1-14 and 1-17 regarding Vegetation Management.

a. Does KPCo employ any procedures or guidance for customer reporting of "danger trees"? If so, identify those procedures and that guidance.
b. Has KPCo considered any customer incentives for reporting and removal of "danger trees" from ROWs?
c. If not, explain fully why not.
d. If so, explain how KPCo has considered this.
e. During 2013 and 2014 has KPCo received any reports from customers regarding danger trees? If so, identify and explain when KPCo received such reports, the nature of each report, and how KPCo addressed each such danger tree situation that was identified.

32. Engage to Gain program.

a. Identify all costs by account in the test year for the Engage to Gain program.
b. Provide a copy of the Engage to Gain program.
c. Identify and provide all presentations in 2013 and 2014 related to the Engage to Gain program.
d. Through December 31, 2014 have there been any net savings from the Engage To Gain program?
e. If so, explain fully, and identify all savings amounts in total and also identify the savings amounts allocated to KPCo.
f. Are there any net savings anticipated from the Engage to Gain program in 2015?
g. If so, explain fully, and identify all savings amounts in total and also identify the savings amounts allocated to KPCo.
h. Through December 31, 2014 have there been any incremental revenues from the Engage To Gain program?
i. If so, explain fully, and identify all revenue amounts in total and also identify the revenue amounts allocated to KPCo.

j. Are there any incremental revenues anticipated from the Engage to Gain program in 2015?
k. If so, explain fully, and identify all revenue amounts in total and also identify the revenue amounts allocated to KPCo.

33. Key Contributor awards.

a. Identify all costs by account in the test year for the Key Contributor program.
b. Provide a copy of the Key Contributor program.
c. Identify and provide all presentations in 2013 and 2014 related to the Key Contributor award program.
d. Through December 31, 2014 have there been any net savings from the Key Contributor program?
e. If so, explain fully, and identify all savings amounts in total and also identify the savings amounts allocated to KPCo.
f. Are there any net savings anticipated from the Key Contributor program in 2015?
g. If so, explain fully, and identify all savings amounts in total and also identify the savings amounts allocated to KPCo.

34. Identify and provide the two most recent AEP Internal Audit Reports on NERC Compliance.

35. Identify and provide the Internal Audit Report on NERC Compliance that was mentioned in the February 22, 2011 board minutes.

36. Mitchell Plant. Refer to the response to AG 1-18. Specifically, the Mitchell Plant Operating Agreement at page 2 states in part: "AEPGR transferred its fifty percent (50%) undivided interest in the Mitchell Facility to Newco Wheeling Inc., exclusive of its interest in the Conner Run Fly Ash Impoundment and Dam ("Conner Run"), which interest in Conner Run was retained on the Transfer Date by AEPGR...". In addition, at page 3, the Mitchell Plant Operating Agreement states in part: "Whereas, the Owners desire that KPCo shall operate and maintain the Mitchell Facility, exclusive of Conner Run (the "Mitchell Plant"), in accordance with the provisions set forth herein;..."

a. As it is not clear from the Mitchell Plant Operating Agreement, please state whether AEPGR retained a 100% interest in the Conner Run Fly Ash Impoundment and Dam upon the 50/50 transfer of the Mitchell Facility between KPCo and Newco Wheeling Inc. If not, explain fully why not.
b. If the answer to part "a" is "no", please state whether KPCo's acquisition of its 50% undivided interest in the Mitchell Facility includes a 50% interest in the Conner Run Fly Ash Impoundment and Dam. If so, please explain fully and in detail why when AEPGR transferred its 50% undivided interest in the Mitchell Facility to Newco Wheeling Inc. exclusive of its interest in Conner Run.
c. If the answer to part "b" is "yes", please quantify and provide a breakout by amount and account of the costs associated with KPCo's 50% interest in Conner Run.

37. Mitchell Plant. Refer to the Asset Contribution Agreement between AEPGR and Newco Kentucky that was filed as Exhibit 1 from the Company's Application that was filed on December 19, 2012. Specifically, Article II - Transfer of Assets (Section 2.01) at pages 9 and 10 of the Asset Contribution Agreement references the following schedules: 2.01(b), 2.01(l), 2.01(m) and 2.01(p).

a. Please provide complete copies of the referenced schedules.
b. Please provide any other pertinent schedules (not referenced above) that also relate to Article II - Transfer of Assets from Section 2.01 of the Asset Contribution Agreement.

38. Incentive Compensation. Refer to the response to AG 1-21. Part "b" to that response states that AEP's 2015 incentive compensation plans have not been finalized and approved as of the date of that initial response.

a. Please state whether AEP's 2015 incentive compensation plans has since been finalized and approved. If so, provide copies of all 2015 incentive compensation plans and quantify the impact on the Company's filing.
b. If the answer to part "a" is "no", please provide the Company's best estimate of when the 2015 incentive compensation plans will be finalized and approved and made available.

c. Referring to AG_1_21_Attachment.pdf (2014 version of Exhibit ARC-5), please state whether the funding measures associated with the incentive compensation costs included in the Company's filing reflect the following percentages under the plan's performance categories: (1) Operating Earnings Per Share - 75%; (2) Safety Matrix - 10%; and (3) Strategic Initiatives - 15%. If not, explain, fully why not.

d. Since the percentages that comprise the Operating EPS, Safety Mix and Strategic Initiatives performance categories, please explain fully and in detail how the funding adjustments for Fatality Adjustment (7.5%) and Culture and Engagement (5%) factor into the plan's performance categories.

39. Vegetation Management. Refer to the response to AG 1-25. Part "c" of that response states that tree caused outages (for trees located in the ROW) accounted for approximately 8.6 million customer minutes of interruption during 2014 and that if outages were completely eliminated, the increased revenues from increased usage would be minimal.

a. Please quantify and explain fully and in detail the revenue lost during 2014 as a result of the 8.6 million customer minutes of interruption due to tree caused outages in the ROW.

b. Please quantify the Company's statement that even if there outages were completely eliminated, that the increased revenues would be minimal. Show detailed calculations.

c. Please state whether the Company's vegetation management program (and filing in the current proceeding) reflects projected increased revenues based on the elimination of a certain percentage of outages in result of removing trees in the Company's ROW. If so, quantify and identify by account where these increased revenues are reflected. If not, explain fully why not.

40. Vegetation Management. Refer to the response to AG 1-28.

a. Please explain fully and in detail how the Internal Energy Requirements listed on Attachment 1 were derived. Show detailed calculations.

b. Please provide the Internal Energy Requirements that are reflected in the Company's filing and show how such amounts were derived. Show detailed calculations.

41. Late Payment Revenues. Refer to the response to AG 1-29.

a. For residential customers, please explain fully and in detail what caused the delayed payment charges to increase substantially from 2011 through 2013 and then drop off during the period January through September 2014.
b. For commercial customers, please explain fully and in detail what caused delayed payment charges to steadily increase in each year 2011 through September 2014.
c. Please provide similar data for all three customer classes for calendar year 2014.

42. Mitchell Plant. Refer to the response to AG 1-30.

a. Please explain fully and in detail whether KPCo's 50% undivided interest in the Mitchell Plant includes 17.5% that relates to excess capacity. If not, explain fully why not.
b. If the answer to part "a" is "yes", please state whether the Company's filing reflects 82.5% of the Mitchell Plant. If so, please quantify how the 82.5% was calculated for each component of rate base (i.e., plant in service, CWIP, accumulated depreciation, ADIT) as well as O&M and depreciation expense. Show detailed calculations.

43. Kentucky Economic Development Surcharge (KEDS). Refer to the response to AG 1-33. Please explain fully and in detail how a provision that requires contributions by shareholders and customers has as much if not more benefit for customers as it does the Company.

44. NERC Compliance and Security Rider (NCCR). Refer to the response to AG 1-34. This response states that AEPSC currently provides centralized NERC compliance and Cybersecurity services to KPCo and that the proposed NCCR is

designed to allow the Company to recover its share of the costs incurred to maintain compliance with NERC standards and maintain cybersecurity.

a. Please explain fully and in detail how the proposed NCCR is designed to work in conjunction with the costs charged to KPCo by AEPSC for providing centralized NERC Compliance and Cybersecurity services to KPCo.
b. Please provide the costs that AEPSC charged to KPCo during the test year for NERC Compliance and Cybersecurity services and show where such costs are reflected in the Company's filing.
c. Please provide comparable NERC compliance and cybersecurity costs for each year 2009 through 2014 by account.
d. Please provide budgeted NERC compliance and cybersecurity costs for each year 2015 through 2018.
e. Please state whether the AEPSC charges to KPCo for NERC Compliance and Cybersecurity services that were incurred during the test year have been removed from O&M expense and transferred into the proposed NCCR. If so, identify where this adjustment is reflected in the Company's filing. If not, explain fully why not.
f. Please provide the projected AEPSC costs for NERC Compliance and Cybersecurity services in the Company's filing for the rate effective period.
g. Please explain fully and in detail how the proposed NCCR does not constitute special issue ratemaking.
h. Please explain fully and in detail whether any of AEP's other operating companies have proposed a similar NCCR in their respective service territories.
i. If the answer to part "f" is "yes", please cite by date and docket number, the Commission Orders addressing the NCCR for AEP's other operating companies.

45. Depreciation Expense. Refer to the response to AG 1-37. Please explain fully and in detail how the $893,905,077 associated with Mitchell's steam production plant at December 31, 2013 was derived. Show detailed calculations.

46. Depreciation Expense. Refer to the response to AG 1-38. Please explain fully and in detail why, based on updated estimates and information, the end of service life for the Mitchell Plant should be changed from 2031 to 2040. In addition, please provide the updated estimates and information which led to the Company's conclusion that the Mitchell Plant's end of service life should be changed to 2040.

47. Power Outages. Refer to the response to AG 1-44. Please explain fully and in detail whether the costs associated with the pilot program scheduled to begin in 2015 is reflected in the Company's filing. If so, quantify and show by amount and account where such costs are reflected in KPCo's filing. Show detailed calculations. If not, explain fully why not.

48. General Ledger. Refer to the response to AG 1-48. Specifically, referring to Attachment 5, please specify which line items of costs that are reflected on the referenced attachment relate to the Mitchell Plant.

49. Internal Audit Reports. Refer to the response to AG 1-51 and the list below. Please provide copies of the internal audit reports listed below.

Year	Project Name	Issue Date
2012	Coal Inventories	1/23/2012
2012	2011 Incentive Compensation Plan Review	2/13/2012
2012	Asplundh Contract Compliance Review	6/27/2012
2013	Coal Pile Inventory	1/23/2013
2013	2012 Incentive Compensation Plan Review	2/12/2013
2013	Storm Restoration Process	4/19/2013
2014	Coal Pile Inventory	1/28/2014
2014	Incentive Compensation 2013	2/13/2014
2014	ESHA - Big Sandy Plant 2014	10/6/2014
2014	Coal Pile Inventory	11/14/2014
2014	Asplundh Tree Expert Company Contract Audit	12/30/2014
2015	NERC 2014 CIP Advisory Review	1/12/2015
2015	Coal Pile Inventories 2014	1/15/2015

50. Materials & Supplies (M&S). Refer to the response to AG 1-54 and Section IV (page 3 of 19) - Balance Sheet - Jurisdictional Assets - September 30, 2014.

a. Referring to AG_1_54_Attachment 1, please reconcile the amounts shown for each component of M&S in the test year to the M&S amounts which total $46,045,697 on lines 26-31 of the Section IV Balance Sheet. Identify, quantify and explain each reconciling item.

b. Referring to the Section IV Balance Sheet, please provide a breakout of the "Other Accounts" M&S which totals $14,118,856 on a Kentucky jurisdictional basis.

51. Contributions in Aid of Construction (CIAC). Refer to the response to AG 1-55.

a. Please state whether the CIAC collected in the test year is reflected as a rate base reduction in the Company's filing. If so, quantify and identify by amount and account where the test year CIAC is reflected in the filing. If not, explain fully why not.

b. Please explain fully and in detail the footnote on Attachment 1 which states: "Beginning in 2014 the remaining CIAC is reclassified to Account 2530 124", including why these amounts were reclassified beginning in 2014. In addition, are these amounts reflected as a rate base reduction in the Company's filing? If not, explain fully why not.

52. Payroll Expense. Refer to the response to AG 1-64 and Section V, Exhibit 2, page 26 from the Company's filing.

a. Please reconcile the test year payroll expense amounts shown on AG_1_64_Attachment1 to the test year payroll expense amounts that are reflected on Section V, Exhibit 2, page 26. Identify, quantify and explain each reconciling item.

b. Referring to Section V, Exhibit 2, page 26, please breakout the payroll expense amounts between salaried and union employees.

c. Referring to AG_1_64_Attachment2, please explain fully and in detail why KPCo's headcount increased from 374 in November 2013 to 640 in December 2013.

53. AEPSC Payroll Expense. Refer to the response to AG 1-65 and Section V, Exhibit 2, page 26.

a. Referring to Attachment 1, please explain fully and in detail why AEPSC's headcount increased from 4,983 employees as of September 2013 to 5,414 employees, or a difference of 431 as of the test year ended September 30, 2014.

b. Please state whether the test year payroll expense amounts on Section V, Exhibit 2, page 26 reflects any payroll expense associated with AEPSC employees. If so, please reconcile such amounts to the test year payroll expense amounts on AG_1_65_Attachment2.

c. If the answer to part "b" is "yes", please provide a breakout of the payroll expense amounts on Section V, Exhibit 2, page 26 between KPCo and AEPSC.

54. Payroll Expense. Refer to the response to AG 1-79.

a. Please explain fully the details regarding the announced plant cutbacks that the Company stated will occur during 2015 and 2016, including the specific plant(s) to which these announced cutbacks apply.

b. Please quantify the anticipated reduction in payroll expense which would result from the employee reductions associated with the plant cutbacks. Show detailed calculations.

c. Referring to the response to part "b" above, please state whether the Company's filing reflects the reduced payroll expense that is anticipated pursuant to the plant cutbacks. If so, identify by amount and account where such payroll reductions are reflected in the Company's filing. If not, explain fully why not.

55. Payroll Expense. Refer to the responses to AG 1-77 and 1-78. The response to AG 1-77, which requested KPCo's merit and cost of living wage rate increase policies, referred to the response to AG 1-78. However, the response to AG 1-78 relates to AEPSC's merit and living wage rate increase policies. Please confirm that KPCo's and AEPSC's merit and living wage rate increase policies are identical. If not confirmed, provide KPCo's policies as originally requested in AG 1-77.

56. Employee Counts. Refer to the responses to AG 1-81 and 1-82. The response to AG 1-81 states that Big Sandy was staffed with 69 full-time employees as of September 30, 2014, but that it is anticipated that this will be reduced to 40 full-

time employees as of June 30 and December 31, 2015 as well as 33 full-time employees as of June 30, 2016.

a. Please confirm that this reduction in Big Sandy employees is attributable to the planned retirement of Big Sandy 2 by June 30, 2015. If not confirmed, explain fully why the Company anticipates the noted reduction in Big Sandy employees.
b. Please explain fully and in detail whether the Company's forecasted payroll and benefits expense reflects the noted reduction in Big Sandy employees. If so, quantify and identify by amount and account where this reduction in payroll and benefits expense is reflected in the Company's filing. If not, explain fully why not.
c. For each of the noted time periods in the responses to AG 1-81 and AG 1-82, please provide a breakout between the Big Sandy 1 and Big Sandy 2 employees.

57. Employee Benefits Expense. Refer to the response to AG 1-92 and Section V, Exhibit 2, page 20.

a. Please reconcile the test year amounts reflected on Section V, Exhibit 2, page 20 to the amounts shown in the response to AG 1-92. Identify, quantify and explain each reconciling item.
b. Please state whether the amounts shown on Section V, Exhibit 2, page 20 reflect any AEPSC employee benefit costs. If so, reconcile such costs to AG_1_92_Attachment3. Identify, quantify and explain each reconciling item.

58. Worker's Compensation. Refer to the response to AG 1-93. Based on what was requested in part "c" of AG 1-93,

a. Please confirm that the $93,480 that is shown on AG_1_93_Attachment2 reflects KPCo's portion of the total invoice amount that is shown on AG_1_93_ConfidentialAttachment1. If not confirmed, explain fully why not.
b. Based on what was requested in part "c" of AG 1-93, please confirm that the $93,480 shown on AG_1_93_Attachment2 reflects the Company's

requested worker's compensation in its filing. If not confirmed, please provide the amount requested for worker's compensation and show how this amount was derived. Show detailed calculations.

59. Employee Benefits Expense. Refer to the response to AG 1-94 and Section V, Exhibit 2, page 20. As there are no health care premiums or related invoices paid to insurance companies since the AEP Medical Plan is self-insured, please explain fully and in detail how the test year and annualized medical plan costs shown on Section V, Exhibit 2, page 20 were derived. Show detailed calculations.

60. Employee Benefits Expense. Refer to the response to AG 1-95 and Section V, Exhibit 2, page 20.

a. Please identify the third party actuary that projected KPCo's medical plan costs for the rate effective period. In addition, please provide the analysis that was performed by this third party actuary which resulted in the amounts reflected for annualized medical plan costs on Section V, Exhibit 2, page 20.
b. Please identify the third party actuary that projected KPCo's dental plan costs for the rate effective period. In addition, please provide the analysis that was performed by this third party actuary which resulted in the amounts reflected for annualized dental plan costs on Section V, Exhibit 2, page 20.
c. Please identify the third party actuary that projected KPCo's long-term disability (LTD) costs for the rate effective period. In addition, please provide the analysis that was performed by this third party actuary which resulted in the amounts reflected for annualized LTD costs on Section V, Exhibit 2, page 20.
d. Please explain fully and in detail why the Company's employees pay approximately 20% of the per employee amount of medical plan costs through payroll deductions, but have to pay approximately 30% of the per employee amount of dental plan costs through payroll deductions.

61. Gains/Losses on Sale of Utility Property. Refer to the response to AG 1-98. Please explain fully and in detail why the net gain of $1,760,623 was not included in cost of service for ratemaking purposes.

62. Lobbying Costs. Refer to the response Staff 1-33.

   a. Please state whether Mr. Keeton's remaining salary of $107,685 ($126,514 - $18,829) was related to lobbying activities. If so, in what account(s) was the $107,685 recorded. If not, explain fully and in detail the activities performed by Mr. Keeton for his remaining salary of $107,685.
   b. What other job functions are performed by Mr. Keeton?
   c. Please explain fully and in detail whether Mr. Hall's $143,275 salary was related to lobbying activities. If so, explain why 100% of his salary was charged to Account No. 920. If not, explain fully and in detail the activities performed by Mr. Hall for his $143,275 salary.
   d. What other job functions are performed by Mr. Hall?
   e. Since the response to Staff 1-33 states that AEP has a Federal Affairs office in Washington D.C. that is responsible for lobbying activities, please confirm that the remaining AEPSC Federal Affairs costs of $1,957,692 ($89,075 / 4.55%) were related to lobbying activities. If so, state the amount of the $1,957,692 that relates to KPCo. If not confirmed, explain fully why not.

63. Self-Funded Reserves. Refer to the response to AG 1-102. The noted data request asked KPCo to explain how the Company's self-insured amounts are treated for ratemaking purposes, but the response was silent to this request. Therefore, please state the Company's ratemaking treatment for its self-funded reserves.

64. Refer to the response to AG 1-103.

   a. Please provide a breakout of the membership dues by organization and include an explanation of how each such organizations benefits ratepayers.

b. Please explain fully and in detail whether the amount of lobbying expense is embedded in the amounts discussed in the response to Staff 1-33. If not, state the account in which these test year lobbying costs were recorded.
c. Please provide a breakout of the test year charitable contributions by organization and specify the account(s) in which these amounts were recorded.
d. Please provide a breakout by amount and account of the public relations expense and include an explanation of how each such public relations expense benefits ratepayers.

65. Rate Case Expense. Refer to the response to AG 1-104.

a. For Case Nos. 2005-00341 and 2009-00459, please indicate at which stage each of these cases settled (e.g., after KPCo rebuttal, before hearings, etc.).
b. Referring to the table below, please explain and reconcile the differences shown between the amounts shown for the cases listed on Attachments 2 and 3 for Case Nos. 2005-00341 and for 2013-00197:

Case No.	AG 1-104 Attachment 2	AG 1-104 Attachment 3	Difference
2005-00341	$ 242,765	$ 198,896	$ 43,869
2009-00459	$ 221,892	$ 221,903	$ (11)
2013-00197	$ 502,620	$ 488,274	$ 14,346

c. Since Case No. 2013-00197 was withdrawn, please explain fully and in detail the Company's proposed treatment of such costs.

66. Please provide a breakout of the advertising costs of $348,764 from Case No. 2013-00197 and explain why there were no such costs in either Case No. 2005-00341 or 2009-00459.

67. Legal Judgments/Settlements. Refer to the response to AG 1-105. Please explain fully and in detail why costs for each the cases/matters listed below were charged to KPCo, and identify the specific subject matter and issues that were in dispute in each matter:

    a. Appalachian Power Company - $56,670;
    b. A.W. Chesterton Company - $30,002 ($16,668 + $13,334);
    c. 3M - $22,003; and
    d. AEP - $10,148.

68. Outside Services. Refer to the response to AG 1-106. Please explain fully and in detail the services provided by each of the following:

    a. Summit Helicopters, Inc.;
    b. Enerfab; and
    c. Jergens, RB Contractors, Inc.

69. Uncollectibles Expense. Refer to the response to AG 1-108. Please provide the test year level of uncollectible expense, and if different than the test year amount, the level of uncollectibles that KPCo is requesting in the current proceeding.

70. Gross Revenue Conversion Factor (GRCF). Refer to the response to AG 1-111. The Company's response to part "c" of this response stated to review the response to KPSC 1-20 for the change in the GRCF used in previous reviews of the environmental surcharge due to the removal of the Section 199 deduction. However, the response to KPSC 1-20 provided the journal entries associated with KPCo's acquisition of the 50% undivided interest in the Mitchell Plant. Please state the correct response that should be reviewed with respect to the GRCF.

71. Injuries and Damages. Refer to the response to AG 1-112. Please confirm that KPCo has reflected the test year level of injuries and damages of $1,187,048 in its filing for the rate effective period. If not confirmed, provide the amount of injuries and damages that the Company is requesting and show how this amount was derived. Show detailed calculations.

72. AEPSC Costs. Refer to the response to AG 1-128.

a. Please clarify the Company's statement that: "The requested amount included in the test year revenue requirement has not been calculated since the adjustments for the removal of Big Sandy costs and the annualization of Mitchell Plant costs were prepared at the account number level and not by the types of costs or department level within the account numbers."
b. Identify the AEPSC costs that KPCo is requesting by account and amount.

73. AEPSC Costs. Refer to the responses to AG 1-130, AG 1-131 and AG 1-132.

a. Please explain fully and in detail why the AEPSC billings to KPCo during the test year of $28,838,839 increased by 26.1% over the 2012 amount of $22,871,510 and by 38.8% over the 2013 amount of $20,773,670.
b. Show exactly what is included in the $28,838,839 by account.
c. Show exactly what is included in the $28,838,839 by AEPSC function.
d. Is there any severance cost included in the $28,838,839?
   i. If so, how much?

74. Commission Mandated Consultant Costs. Refer to the response to AG 1-137 and the Direct Testimony of Company witness Rogness at pages 6-7.

a. Please explain fully and in detail the Company's justification for proposing to amortize the consultant costs from proceedings which were incurred prior to the test year.
b. Please state whether the Commission has authorized this type of adjustment in past KPCo proceedings. If so, cite by date and docket number, the Commission Order(s) which approved this proposed adjustment.

75. Negative Net Salvage. Refer to the response to AG 1-141. Please identify by account where the negative net salvage of $17.7 million as of September 30, 2014 is reflected in the Company's filing. In addition, show how this amount was derived. Show detailed calculations.

76. AEPSC Capital Software Charges. Refer to the response to AG 1-143.

a. Referring to AG_1_143_Attachment2, please explain fully and in detail why, with the exception of Work Order SITC601601, there were no AEPSC capital software charges (over $20,000) to KPCo during the period 2007 through 2010.
b. Pursuant to part "a" above, please explain fully and in detail why, unlike the periods 2007 through 2010, and with a few exceptions for 2011, why the bulk of the AEPSC capital software charges to KPCo occurred mainly during the period 2012 through 2014.
c. Referring to AG_1_143_Attachment3, please explain fully and in detail the project associated with Work Order SITE601601, with O&M expenses totaling $364,963 during 2014 and with the bulk of this amount ($332,155) being recorded in Account 935.

77. Construction Work in Progress (CWIP). Refer to the response to AG 1-163.

a. Please explain fully and in detail why only depreciation expense (and not accumulated depreciation) should be adjusted to account for any additional depreciation expense as a result of transferring CWIP to plant in service.
b. Referring to KPCo's response to part "c" from AG 1-163, please quantify the ADIT as of September 30, 2014 that relates to CWIP and has been included in rate base and show how this amount was derived. Show detailed calculations.

78. Materials & Supplies (M&S). Refer to the response to AG 1-166.

a. Please explain fully and in detail why the M&S amounts related to O&M were so much higher in 2013, 2014 and the test year as compared to 2011 and 2012.
b. Identify the amount of obsolete M&S written off in each year 2009 through 2014.
c. Identify the amount of obsolete M&S written off in the test year.
d. If different from the amount identified in the response to part c, identify the amount of obsolete M&S requested by KPCo in its filing, by account.

79. Bonus Depreciation. Refer to the responses to AG 1-171 and AG 1-172.

a. Please confirm that ADIT should be increased by $23.6 million to reflect the impacts associated with the passage of the Tax Increase Prevention Act of 2014.
b. Please show how the $23.6 million was derived. Show detailed calculations.
c. Please quantify the impact that increasing ADIT by the $23.6 million would have on the capitalization amount of $1,147,480,328. Show detailed calculations.
d. Please quantify the impact that the additional Normalized MACRS Schedule M deduction of $67,446,000 would have on the Company's filing. Include supporting calculations.
e. Would the impact of 2014 bonus tax depreciation have been included in KPCo's filing as increased ADIT but for the timing of when the Tax Increase Prevention Act of 2014 was signed into law? If not, explain fully why not.

80. Affiliate Charges. Refer to the response to AG 1-173. Please explain fully and in detail why Appalachian Power Company charged costs totaling $1,028,149 (and which comprises 61.4% of total affiliate charges) during calendar 2014.

81. Tax Refunds. Refer to the response to AG 1-183. Please explain fully and in detail why the tax refunds discussed in this response were correctly not included in cost of service in this proceeding.

82. Depreciation. Refer to the response to AG 1-189.

a. Please explain fully and in detail why a theoretical reserve for the Big Sandy plant was not calculated.
b. Please quantify what the Big Sandy theoretical reserve would be. Show detailed calculations.
c. Please quantify the reserve deficiency that is referenced in KPCo's response to part "b" of this response.

83. Gross Salvage and Cost of Removal. Refer to the response to AG 1-221. Please explain how KPCo determined whether any gross salvage and cost of removal was abnormal and required adjustment.

84. Big Sandy 2. Refer to the response to AG 1-227. Please explain fully and in detail whether the Company's filing reflects reutilizing any of the Big Sandy 2 equipment. If so, specify each piece of equipment that is being reutilized and quantify the associated impact on the Company's filing. Show detailed calculations.

85. FIN 47. Refer to the response to AG 1-248. This response states that the implementation of FIN 47 caused the KPCo to consider asbestos removal as an asset retirement obligation (ARO) and to exclude the asbestos cost removal from future depreciation rates, but that the Company has not performed the analysis to reflect the impact of excluding the cost of removing asbestos from such rates.

   a. Please explain fully and in detail the impact that not performing the referenced analysis has on the Company's filing.
   b. In lieu of performing the requested analysis, provide the Company's best estimate as to the impact of excluding the asbestos cost of removal from future depreciation rates.

86. Payroll Tax Expense. Refer to the response to AG 1-257. Please explain fully and in detail why the Company's FICA wage base dollars included in total wages increased 78.7% from 12/31/2013 to 12/31/2014.

87. Athletic Events. Refer to the response to AG 1-268. Please state whether the amounts shown in this response are Kentucky jurisdictional amounts. If not, provide such jurisdictional amounts.

88. Big Sandy Unit 1 Operation Rider (BS1OR). Refer to the response to AG 1-287 as well as KIUC 1-17 Attachments 39 and 46.

   a. Please reconcile the total Company January through September 2014 PJM charges and credits of $4,300,110 ($4,239,908 KY jurisdictional) per KIUC 1-17 Attachment 46 to KIUC 1-17 Attachment 39. Identify, quantify and explain each reconciling item.

89. AFUDC Offset Adjustment. Refer to the response to AG 1-312. The Company stated that while it does not have specific documentation available, it has prepared an AFUDC offset adjustment in each base rate case since 1984.

a. Please explain fully and in detail whether Commission has approved this adjustment in each base rate case since 1984. If so, cite by date and docket number each such Commission Order approving this adjustment. If not, explain why not.

90. Reference the response to KIUC 1-54 Data Request regarding off-system sales margins.

a. Explain the percentage of off-system sales (OSS) margins that are derived as a result of offering units into the PJM market that are subsequently dispatched by PJM.
b. Explain what actions KPCo or AEC on KPCo's behalf actually takes beyond prudently offering units into the centrally dispatched PJM market to maximize OSS margins.
c. Explain what actions KPCo or AEC on KPCo's behalf could take that would lessen OSS margins if they are prudently offering ratebase units into the PJM market if no incentive is provided to keep part of the OSS margins.
d. Provide details on all OSS margins that are derived on behalf of KPCo that are not a result of participating in the PJM market with KPCo ratebased units.
e. Does KPCo propose to share OSS margins that are not directly related to KPCo ratebased units (i.e. other AEC asset or non asset based market sales) with customers?
f. Are the costs necessary for KPCo (or AEC on KPCo's behalf) to offer its units into the PJM market recovered from customers?
g. Are the personnel involved already offered incentive pay reflecting their performance in offering KPCo generation into the PJM market?
h. Is this incentive pay entirely taken from the OSS margins or is this part of the payroll package that KPCo proposes to recover separately in its revenue requirements?
i. Is there a distinction made between OSS margins obtained merely because KPCo's generation units are prudently offered into the PJM market and other OSS margins obtained?
j. Has KPCo ever justified buying, building, purchasing, improving, selling or decommissioning any generation facility in an application before the PSC by studies that involved future OSS margins?

i. Did such studies assume that 40% of the OSS margins would not be used to benefit KPCo's customers?
ii. If not how does this claw back affect every study provided to the PSC in the last 10 years?

k. How did KPCo arrive at the 40% "incentive" for OSS margins?
i. Wouldn't 30% retention of OSS margins also be an incentive?
ii. What about 10%, wouldn't this still be an incentive?
iii. What about 1%, wouldn't this still be an incentive?

91. Reference vegetation management capital costs and expenses.

a. Are vegetation management costs related to transmission facilities placed under the PJM OATT part of the vegetation management plan?
b. Verify these costs are recovered under the PJM OATT and not separately from KPCo retail customers.

92. Reference KPCo transmission facilities. Does KPCo have any transmission facilities under the PJM OATT with distribution underbuild? If so please respond to the following:

a. Provide a list with descriptions, including voltage of transmission and distribution facilities as well as the length of each underbuild.
b. How are costs allocated between the transmission and distribution facilities?
c. How are vegetation management costs allocated between the transmission and distribution facilities?

93. Regarding the KPCo allocation differences for primary and secondary distribution, as discussed in response to KPSC 2-95 and shown on spreadsheet titled:
KIUC_1_17_Attachment35_Stegall_JMS_2_and_JMS_3_CCOS_and_Revenue_Allocation, please explain the following:

a. How KPCo allocates distribution vegetation management costs between primary and secondary distribution.
b. How the same costs are allocated when distribution structures carry both primary and secondary distribution facilities.

c. Provide 5 years of historic information regarding the amounts of vegetation management program costs allocated to both primary and secondary distribution facilities.

94. Regarding the KPCo Distribution Vegetation Management Plan reports provided in response to AG 1-16 please provide the following:

a. A copy of the referenced contractor productivity program.
b. A copy of the referenced contractor quality incentive program.
c. An explanation and discussion of why there are no funds in any plan year after 2010 for aerial saws.
d. Describe when and where stump grinding is used and what guidelines for stump grinding are provided to contractors.
e. Explain why Asplundh needs an additional incentive to perform.

95. Regarding KPCo's response to AG 1-17 (c) and (e), regarding the management of the vegetation management program, please provide the following:

a. A detailed organization chart starting from the 6 utility foresters up the chain of command, listing the organization each position works for, and the costs of that position that are allocated to KPCo's vegetation management program.
b. Explain in detail how these vegetation management program management costs are allocated between primary and secondary distribution facilities and amounts allocated in the test year revenue requirements.

96. Regarding KPCo's response to AG 1-14 (d) please provide the following:

a. Explain if the AEP Operating companies' accounting guidelines for vegetation management have been reviewed by an independent auditor, and if so, the auditor's conclusions. Provide any and all reports and/or management letters from any and all such independent auditors.
b. Provide a list of unaffiliated utilities that use the same or similar accounting guidelines for vegetation management.

97. Regarding the Vegetation Management Program please provide the following:

a. Explain how KPCo uses customer reporting to evaluate its vegetation management plan.
b. Explain how KPCo uses customer reports of danger trees to plan vegetation management work.
c. Explain how KPCo uses customer reports to identify vegetation management work plans.

98. Referring to the NERC Compliance and Cybersecurity Rider (Tariff N.C.C.R) discussed on page 26 and 27 of the Direct Testimony of Ranie K. Wohnhas please provide the following:

a. A full description of how costs would be allocated among AEP operating companies to KPCo before being recovered in this tariff.
b. A full description of how N.C.C.R costs that are allocated to transmission, and recovered under KPCo's PJM OATT would be allocated to the N.C.C.R tariff and how such costs would not be double recovered under the PJM rider.
c. Why the N.C.C.R is even needed at all in light of the PJM rider.

99. Please reference the Company's response to AG 1-7.

a. Please provide the residential average bill for 1000 kWh based upon the EEI's Typical Bill and Average Rates Report, Winter 2014.
b. Provide the average residential electricity bill for the state of Kentucky per the Summer and Winter 2014 report.
c. Provide the average residential electricity bill for the region per the Summer and Winter 2014 report.
d. Provide the average electricity bill for Kentucky Power residential customers for both the Summer and Winter 2014.

100. Please reference the Company's response to AG 1-7. The company provides a comparison of residential electric bills effective 1/1/2015 and states the source as the EEI Typical Bills and Average Rates Report, Winter 2015. Please explain if the source is accurately reflected as Winter 2015.

a. Do the comparisons of residential bills between the Company, Duke Energy (Kentucky), Louisville Gas &Electric Co., and Kentucky Utilities reflect the Company's current rates or proposed rates? If the proposed rates were not used in the comparison please provide the information based upon the Company's proposed rates.

101. Please reference the Company's response to AG 1-8.

a. Does the Company plan to continue to fund the Kentucky Power company Economic Advancement Program with shareholder funds beyond 2018, or will the contribution cease in 2018? Please explain the answer in full detail. If the contribution will cease in 2018 please explain why.

102. Please reference the Company's response to AG 1-9.

a. Clarify if the $8,000 award for advanced economic training is for a Kentucky Power Company employee or for a community member.
b. Please explain why the $8,000 award appears to be given to the University of Oklahoma instead of utilizing an Eastern Kentucky college and/or school.

103. Please reference the Company's response to AG 1-10.

a. Provide a detailed explanation of how the Company partnered with local banks to provide $75 million in local bank financing for upcoming capital projects. Also, as requested previously provide a detailed list of the capital projects included in the $75 million dollar loans.
b. Provide a detailed list of the amount of loans attributed to each of the twelve banks, and explain how the Company chose the participating banks.

104. Please reference Greg Pauley's Testimony pp. 9-10, lines 29-31 and 1-2 respectively.

a. Elaborate and explain in full detail how the company is an active participant in Shaping Our Appalachian Region ("SOAR") established to improve the economy and quality of life in Eastern Kentucky – the Company's service territory.

b. Provide any and all success that SOAR has accomplished for the area.
c. Identify costs for SOAR by account that KPCo recorded during the test year.
d. If different from the amounts identified in response to part c, identify the costs for SOAR that KPCo is requesting as part of its revenue requirement in the current rate case.

105. Please reference Greg Pauley's Testimony p. 10, lines 3-10, as well as the Company's response to AG 1-32 and explain what "key economic development activities" within the region the Company plans to use the Kentucky Economic Development Surcharge ("K.E.D.S.") funds for if approved.

106. Please reference the Company's response to AG 1-33 and provide what benefits K.E.D.S. would provide to the customers versus the shareholders.

107. Please reference the Company's response to AG 1-43.

a. Provide the staffing levels of the Company's customer service department for the past three (3) calendar years.
b. Provide the budget of the Company's customer service department for the past three (3) years.

108. Please reference the Company's response to AG 1-268.

a. Explain if the $2,226.00 for UK Football Tickets and the $29,256.00 PGA Championship tickets were included or excluded for ratemaking purposes.
b. If the amounts were included for ratemaking purposes please explain why, and identify in which account these amounts were recorded.

109. Big Sandy Plant. Refer to the response to AG 1-325 and more specific the Big Sandy 1&2 Conceptual Demolition Cost Estimate.

a. Referring to page 2 of the demolition study, please explain fully and in detail whether the amounts shown in the Cost Estimate Results Summary which total $28,831,786 are included in the Company's filing. If so, identify by amount and account, where each component of the cost estimate is reflected in the filing. If not, explain fully why not.
b. Please state the current status with regard to the Company's demolition plans as it relates to the Big Sandy plant.
c. With regard to the proposed contingency of $9,209,600, please explain fully and in detail the Company's rationale for calculating a separate 15% contingency on (1) materials; (2) labor; (3) subcontractors; (4) scrap recovery; and (5) indirect costs as opposed to calculating an overall contingency factor of 15%.

110. Capitalization. Refer to the response to AG 1-285. Please explain fully and in detail the Company's criteria for determining whether an adjustment to rate base also has a corresponding adjustment to the capitalization amount of $1,147,480,328.

111. Big Sandy Decommissioning Costs. Refer to the response to AG 1-326. Please state whether the projected Big Sandy decommissioning O&M costs which total $6,058,782 are reflected in the Company's filing. If so, identify by amount and account where each component of these costs are reflected in the filing. If not, explain fully why not.

112. Commercial and Industrial Customers. Refer to the response to AG 1-331. The response states that due to the advanced start date for these commercial and/or industrial customers' expansion and/or reduction/closure projects, that the specific rate code has not yet been determined, thus it is not possible to provide the amount of increased revenue associated with the expansion projects.

a. Referring to AG_1_331_Attachment1, with the exception of items 2, 8 and 14, the effective dates (most of which were in 2014) of the expansion or closure projects have already occurred. Based on the foregoing, please explain fully and in detail why the specific rate codes for these projects cannot be determined.

b. Pursuant to part "a" above, for each item listed on the attachment, provide the Company's best estimate for the increased or decreased revenues depending on whether the project is expanding, being reduced or closed.
c. Referring to AG_1_331_Attachment1, for each expansion or closure project listed, please indicate the associated commercial and/or industrial customer.

113. PJM Rider. Refer to the response to AG 1-337. Referring to the two attachments provided with this response, please explain fully and in detail why the forecasted PJM transmission costs for 2015, 2016 and 2017 are so much higher those incurred in calendar years 2009 through 2014.

114. Big Sandy Unit Operation Rider (BS1OR). Refer to the response to AG 1-338 and Company Exhibit AEV-4. Please reconcile the amounts shown on AG_1_338_Attachment1 to the proposed BS1OR revenue requirement of $18,245,412. Identify, quantify and explain each reconciling item and show detailed calculations.

115. Incentive Compensation. Refer to the response to AG 1-369.

a. Please provide the amounts shown on AG_1_369_Attachment1 on a Kentucky jurisdictional basis.
b. Please clarify the Company's statement that: "The requested amount included in the test year revenue requirement has not been calculated since the adjustments for the removal of Big Sandy costs and the annualization of Mitchell Plant costs were prepared at the account number level and not by the types of costs within the account numbers."