

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

ATTORNEY GENERAL’S MOTION FOR A LIMITED EXTENSION OF TIME WITHIN
WHICH TO FILE CERTAIN SUPPLEMENTAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby moves the Commission to grant a limited extension of time within which to file certain supplemental data requests in the above-styled matter. In support of this motion, counsel states as follows.

Pursuant to the procedural schedule issued in this matter on January 13, 2015, the Attorney General on January 29, 2015 filed his Initial Data Requests in this matter to Kentucky Power Company [“KPCo”]. On or about February 11, 2015 KPCo filed its responses to these data requests, as well as data requests filed by other intervenors and Commission Staff. With regard to KPCo’s responses to the following data requests of the Attorney General, AG 1-62, 1-85, 1-143, 1-147, 1-148, and 1-170, KPCo objected to providing the requested data but made certain documents available for inspection at KPCo’s Frankfort, Kentucky office, and in the Columbus, Ohio offices of KPCo’s parent company, American Electric Power [“AEP”]. Counsel for the Attorney General viewed these documents

on February 19th - 20th, 2015. Regarding the KPCo responses to AG 1-147 and 1-148, and by agreement with counsel for KPCo, the Attorney General's consultants in this matter will be conducting a review of responsive documents in the offices of AEP's auditor, Deloitte, located in Detroit, Michigan, on Wednesday February 25, 2015.

In further support of this motion, counsel states that during the week of February 16-20, 2015, the Commonwealth experienced extremely cold and inclement weather with heavy snowfall, which made travel impossible for several days. In addition, the documents that were reviewed in offices located in Frankfort and Columbus were voluminous, and took extensive time to review. Finally, the inspection of documents responsive to AG 1-147 and 1-148 could not have been scheduled earlier, both for logistical purposes and due to the inclement weather, which made it difficult and time-consuming for counsel for the Attorney General and KPCo to discuss arrangements for the various document reviews.

Pursuant to the pending procedural schedule, supplemental data requests must be filed by Tuesday, February 24, 2015. The Attorney General moves for an extension of time to file supplemental data requests pertaining to the above-referenced initial data requests through and including Friday, February 27, 2015. As to all other matters not covered by one of the above-referenced initial data requests, the Attorney General will be able to file supplemental data requests in accordance with the procedural schedule by Tuesday, February 24, 2015.

Counsel for KPCo has authorized counsel for the Attorney General to represent that he has no objection to this motion.

WHEREFORE, counsel for the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that: (a) the foregoing is a true and accurate copy of the same document being filed in paper medium; (b) pursuant to 807 KAR 5:001, Section 8(7)(c), there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and (c) the original and copy in paper medium is being filed with the Commission on February 24, 2015.

I further certify that in accordance with 807 KAR 5:001 § 4 (8), the foregoing is being contemporaneously provided via electronic mail to:

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this 23rd day of February, 2015



Lawrence W. Cook
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