

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application of Kentucky Power)	
Company For (1) A General Adjustment of Its)	
Rates for Electric Service; (2) An Order)	
Approving Its 2017 Environmental Compliance)	CASE No.
Plan; (3) An Order Approving Its Tariffs and)	2017-00179
Riders; (4) An Order Approving Accounting)	
Practices to Establish a Regulatory Asset or)	
Liability Related to the Big Sandy 1 Operation)	
Rider; and (5) 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 July 17, 2017, the Attorney General on August 14, 2017 filed his Initial Data Requests to Kentucky Power Company [“KPCo”]. On August 28, 2017 KPCo filed its responses to these data requests, as well as data requests filed by other intervenors and Commission Staff. In AG 1-140, the Attorney General requested copies of each adjusting entry proposed by the internal auditor for KPCo, American Electric Power [“AEP”] and the AEP Service Company, together with supporting documentation. In AG 1-141, the Attorney General requested copies of KPCo’s and AEP’s two most recent management letters and recommendations received from the companies’ independent auditors.

In response to both AG 1-140 and AG 1-141, KPCo replied that: (a) the documents requested are proprietary to Deloitte and Touche, LLP [“Deloitte”], the internal auditor for KPCo, AEP and the AEP Service Company, and that as such, KPCo is not able to produce them; but (b) nonetheless, subject to certain conditions mandated by Deloitte, Deloitte may make the documents available for inspection at one of that company’s offices. Counsel for KPCo has represented that KPCo and AEP are working with Deloitte to arrange such an inspection within the next few working days. However, such an inspection cannot be arranged until after the due date for the supplemental data requests, September 8, 2017.

The Attorney General intends on filing his supplemental data requests in this matter no later than September 8, 2017, with the exception of questions pertaining to AG 1-140 and AG 1-141. With regard solely to those items, the Attorney General has reached an agreement with counsel for KPCo for the Attorney General to file supplemental requests within five (5) days following the inspection of the documents which Deloitte maintains are proprietary. KPCo would then be granted five (5) days to file responses.

WHEREFORE, the Attorney General respectfully requests that the Commission grant the limited extension as set forth above in more detail. Counsel for KPCo has authorized counsel for the Attorney General to represent that he has no objection to this motion.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing has been transmitted to the Commission on September 6, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 6th day of September, 2017.



Assistant Attorney General