

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 SUPPLEMENTAL DATA REQUESTS
PUBLIC REDACTED VERSION**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Supplemental Data Requests to Kentucky Power Co. [hereinafter “KPCo”] to be answered by the date specified in the Commission’s Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for KPCo with an electronic version of these questions, upon request.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, request clarification directly from Counsel for the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings

and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

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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 11, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

This 8th day of September, 2017.



Assistant Attorney General

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1. Please list the counties in which KPCo operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.
2. Please list the Zip Codes in which KPCo operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.
3. Please provide the number of KPCo residential customers who made at least one late payment in each of the years 2017, 2016, 2015, 2014, and 2013.
 - a. Please additionally provide the information requested above for: (i) each county in which KPCo operates; and (ii) each zip code in which KPCo operates. If possible, provide this data in the form of an Excel spreadsheet.
4. How many KPCo residential accounts were shut-off for nonpayment in each year 2013, 2014, 2015, 2016, and 2017?
 - a. Of the accounts in the answer above, how many of those were shut-off more than once for non-payment?
5. How many KPCo residential accounts were shut-off for nonpayment in each year 2013, 2014, 2015, 2016, and 2017 in each county in which KPCo operates? If possible, provide this data in the form of an Excel spreadsheet.
 - a. How many KPCo residential accounts were shut-off for non-payment in each year 2013, 2014, 2015, 2016, and 2017 in each zip code in which KPCo operates?
6. Please provide the average monthly bill amount (in dollars, not usage) for KPCo residential customers (as a whole) each year 2012, 2013, 2014, 2015, and 2016.
7. How many KPCo customers paid a reconnect fee in the past 12 months?
8. Please provide the average KPCo residential bill amount (in dollars, not usage) for each of the past 12 months.
9. Please provide the monthly fixed customer charge in effect for KPCo residential customers for each year 2012, 2013, 2014, 2015, 2016, and 2017.
10. How many KPCo residential customers received disconnect notices in each year

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2013, 2014, 2015, 2016, and 2017?

- a. How many KPCo residential customers received disconnect notices in each of the years 2013, 2014, 2015, 2016, and 2017: (i) in each county in which KPCo operates; and (ii) in each zip code in which KPCo operates?
11. How many KPCo residential customers received bill paying assistance from a third party agency in each of the years 2013, 2014, 2015, 2016, and 2017?
 - a. Please provide the number of residential customers by counties in the KPCo service area who received bill paying assistance from a third party agency, in each of the years 2013, 2014, 2015, 2016, and 2017. If possible, please provide this data in the form of an Excel spreadsheet.
 12. Please provide the average annual usage for KPCo residential customers (as a whole) for each of the following years: 2013, 2014, 2015, 2016, and 2017.
 13. Please provide the average annual usage for KPCo residential customers who received bill paying assistance from a third party agency (as a whole) in the years 2013, 2014, 2015, 2016, and 2017.
 14. Reference the KPCo filing in Case No. 2017-00328, "Electronic Application of Kentucky Power Co. for a Certificate of Public Convenience and Necessity to Construct a 161 kV Transmission Line In Perry And Leslie Counties, Kentucky and Associated Facilities (Hazard-Wooton Line)."
 - a. State whether any of the costs of this proposed project are in the test year of Case No. 2017-00179.
 - b. State whether KPCo ratepayers will be responsible for all or any portion of the costs associated with the Hazard-Wooton Line.
 - c. State the amount of costs that PJM will provide for the construction of the Hazard-Wooton Line.
 - (i) Provide copies of all documents KPCo and/or any of its affiliates submitted to PJM associated with the Hazard-Wooton Project.
 - d. Reference the article at the link below,¹ in which KPCo announced a \$30 million "Eastern Kentucky Transmission Project," to "strengthen and

¹ <http://www.lanereport.com/80348/2017/08/ky-power-announces-30-million-regional-power-grid-upgrade-will-be-first-of-several-projects/>

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upgrade the regional power grid over five to seven years to better service customer.” Provide complete details regarding this project.

15. Identify any and all transmission projects within Kentucky's geographic borders which any AEP affiliate either undertook in the historic test year, or will undertake in the next three calendar years.
 - a. Of those projects identified above, state the amount for which KPCo ratepayers will become financially responsible.
16. Identify where in the application the total dollar impact of the proposed rate increases on KPCo's average residential class customer can be located.
 - a. State whether the total impact identified above included KPCo's all-in rates (Fuel Adjustment Charge, ECR, and all other trackers).
17. Provide the annual electricity consumption for KPCo's average residential customer.
 - a. Provide the amount of the total bill for KPCo's average residential customer: (i) averaged for the 12 months of the historic test period; and (ii) averaged for the four-month period November of 2016 through and including February of 2017.
 - b. Provide the amount of the Fuel Adjustment Charge that KPCo's average residential customer paid for each month of the historic test year.
 - c. Provide the amount of the Environmental Surcharge that KPCo's average residential customer paid for each month of the historic test year.
 - d. Provide the amount of the Demand Side Management Adjustment Factor that KPCo's average residential customer paid for each month of the historic test year.
 - e. Provide the amount of the Capacity Charge that KPCo's average residential customer paid for each month of the historic test year.
 - f. Provide the amount of the Big Sandy 1 Operation Rider charge that KPCo's average residential customer paid for each month of the historic test year.
 - g. Provide the amount of the Big Sandy Retirement Rider charge that KPCo's average residential customer paid for each month of the historic test year.
 - h. Provide the amount of the Purchase Power Adjustment charge that KPCo's average residential customer paid for each month of the historic test year.

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18. Reference the update KPCo filed in Case No. 2011-00179 on May 16, 2017, regarding Call Center Performance Measures for calls from KPCo customers.
- a. In addition to the three metrics provided in that update, provide the following for the historic test year, and for calendar year 2016:
 - (i) Number of calls received;
 - (ii) The percentage of the total number of KPCo customers reporting complaints;
 - (iii) Particulars of complaints (i.e., billing issues, disconnects, cost of service, service issues, vegetation management, etc.); and
 - (iv) Percentage of complaint calls that were resolved to the customer's satisfaction.
 - b. Provide the total number of complaints for calendar years 2015, 2016 and 2017 to date.
19. Refer to the September 1, 2017 Supplemental Response to Commission Staff's Data Request 1-56, and the corresponding attachment, KPCO_1SR_KPSC_1_56_Attachment1.
- a. Does the \$663,050 amount represent the entire cost of the notice required for the Application?
 - (i) If not, what additional costs does the Company expect to incur?
 - (ii) If so, provide the estimated amount.
 - b. Of the actual Publication expense of \$663,050, how much will the Company request recovery of from customers? How did the Company determine this amount?
 - c. Will the Company commit to limit the amount designated as Publication Notices expenses to be recovered from customers to the \$640,000 estimate?
 - (i) If not, why not?

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(ii) If the Company will so commit, how much does it expect to spend on Publication Notices that it will not recover from customers?

d. In addition to Publication Notice expense, will the Company commit to not request recovery of any associated Legal or Consultant expense stemming from KPCO's errant public notice? If not, why not?

20. Refer to the September 1, 2017 Supplemental Response to Commission Staff's Data Request 1-56, and the corresponding attachment, KPCO_1SR_KPSC_1_56_Attachment2.

- a. Confirm that the Company has included receipts for food/meals in response to this data requests, including, but not limited to a receipt from Panera Bread on page 53 and 54.
- b. Confirm that the Company has included food/meal expenses details in the summary tab of KPCO_1SR_KPSC_1_56_Attachment1.
- c. Is the Company requesting recovery of these expenses in this matter? If so, on what basis does KPCO believe recovery of these costs is reasonable? Provide a complete, detailed response explaining your answer.
- d. If the Company is not requesting recovery of expenses for food/meals in this matter, provide a complete, detailed response explain why the receipt were included in response to Commission Staff 1-56. If recovery is not requested, this response should also include an explanation as to why meal expenses were detailed in the Summary tab of KPCO_1SR_KPSC_1_56_Attachment1.

21. Refer to the Company's Tariff Economic Development Rider ("EDR")

- a. Provide the total number of customers that are currently receiving service under the Company's Tariff EDR.
- b. For each customer identified in (a) provide the date service began and the date service under the Tariff EDR ends.

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- c. Provide the annual cost savings realized by each of the customers identified in (a) for each year since the inception of Tariff EDR.
 - d. Provide all workpapers and source documents in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
22. Describe the rationale and methodology utilized by the Company to determine Tariff EDR's current tiered benefit. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
23. Tariff EDR Subsidy
 - a. Provide the level of subsidy received by each customer subscribing to the Tariff EDR for each year since its inception.
 - b. Explain how the subsidy associated with Tariff EDR was financed for each year from since its inception. For example was the subsidy built into rates and essentially collected from customers that could not or did not subscribe to the Tariff EDR.
 - c. Provide the amount of subsidy provided to each customer that opted for the Tariff EDR in each year it was offered.
24. Provide all documents, analyses and studies undertaken by or on behalf of the Company that have examined whether the KEDS and K-PEGG grant program have increased load allowing the Company to recover the incremental cost experienced serving the increased load? Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
25. Explain if the additional load that has been provided by grant recipients under the K-PEGG program has allowed the Company to recovery the short-run and long-run costs of serving these customers. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used.

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26. Utilization Studies

- a. Provide all documents, analyses and studies undertaken by or on behalf of the Company that have examined the utilization of KEDS funds for grants as a means of incentivizing increased utilization of the Company's electrical system. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used.
- b. To the extent no materials exist that are responsive to (a) above, confirm explicitly that no such materials are within the Company's possession.

27. Explain whether KEAP is fully funded by AEP's shareholders, or from other AEP funds. If the latter, identify the source of the funds.

28. Explain in detail if the Company would experience a deterioration in sales if KEDS was eliminated?

29. Provide all cost-benefit analyses that have been conducted by or on the behalf of the Company that evaluate the cost-effectiveness of the Company's KEDS and K-PEGG program. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

30. Provide a detailed explanation regarding KEDS and its impact on the Company's earnings including the ability for the Company to earn a fair return. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

31. Provide all studies and analyses conducted by or on the behalf of the Company that examine, discuss or show whether KEDS is necessary to alleviate any earnings challenges KPCo has experienced, is currently experiencing or may experience in the future. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data

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used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

32. Efficiency Benefits of K-PEGG

- a. Provide all studies and analyses conducted by or on the behalf of the Company that examine if grant recipients receiving funding under K-PEGG have promoted more efficient utilization of the Company's electric system through increased electrical usage and/or higher load factor.
- b. If the Company's response to (a) is negative, explain if the Company believes the ultimate beneficiaries of grants have been providing any efficiency benefits relating to the utilization of the Company's infrastructure.
- c. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

33. Refer to the Company's response to AG_1_309 (c) where it states "the Company anticipates the addition of approximately 74 MW of demand from additional load when these projects are fully realized." Provide the total estimated amount of revenue that the Company believes will be generated from the addition of 74 MW of load. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

34. Refer to the Company's response to AG_1_356 where it states "although documents may exist that reference customer attrition but do not provide the requested analyses." Provide the referenced documents in the Company's possession or control that address customer attrition since 2007.

35. Refer to the Company's response to AG_1_361 where it discusses the applications that were denied under the K-PEGG program. Provide all written and defined criteria that the Economic Development Team uses to evaluate whether or not an application is complete.

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36. Refer to the Company's response to AG_1_363 part (a). The question was not asking for information on other utilities providing economic development efforts in Kentucky Power's service territory but the service territories of those other respective utilities. To clarify:
- a. Is the Company aware of any other electric or natural gas utilities that provide economic development assistance to local entities or to businesses looking to locate to that utility's respective service territory?
 - b. To the extent the Company's response to (a) above is in the affirmative, provide a list of regional utilities the Company is aware of.
 - c. For each utility referenced in response to (b) above, provide the economic development program or programs offered by the utility, and associated program parameters.
 - d. Has the Company compared its economic development initiatives to that of other utilities offering economic development opportunities?
 - e. To the extent the Company's response to (b) above is in the affirmative, provide copies of the Company's comparisons of its offerings to other relevant utilities.
 - f. Provide all supporting workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
37. Refer to the Company's response to AG_1_384 where it references the semi-annual EEI Rate Comparison - Industrial and Residential report to compare its rates to other utilities. Provide a copy of the semi-annual EEI Rate Comparison reports from 2014 through 2017.
38. For the purposes of this request, refer to the Company's response to AG-1-015, where the Company disagrees that placing a large percentage of rate increases upon the monthly customer charges does not deprive customers of the monetary incentive for conserving energy through less usage.
- a. Does the Company agree that fixed charges such as customer charges are unavoidable? Confirm or deny.

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- b. To the extent the Company's response to (a) is in the negative, provide a detailed narrative explaining how a customer can avoid a fixed monthly charge such as a customer charge.
 - c. Does the Company agree that conservation activities on the behalf of customers are typically designed to reduce annual energy usage? Confirm or deny.
 - d. To the extent the Company's response to (c) is in the negative, provide a detailed narrative explaining how a customer's conservation activity typically affects annual energy usage.
39. For the purposes of this request, refer to the Company's response to AG-1-016, where the Company states that in the test year the average kWh usage for the Company's low-income energy assistance customers is greater than the average kWh usage for the residential class as a whole.
- a. Provide a copy of the referenced analysis.
 - b. Provide an analogous analysis for each of the past five years, 2012 through 2016.
 - c. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
40. For the purposes of this request, refer to the Company's response to AG-1-342, where the Company states that it does not perform the requested calculation of base revenues in the normal course of business.
- a. Confirm that the Company does not calculate non-fuel tariff revenues in the normal course of business.
 - b. To the extent the Company's response to (a) is in the negative, provide monthly tariff revenues for each of the years 2011 through 2016, and each month of 2017.
 - c. Provide all workpapers and source documents supporting the Company's response in electronic spreadsheet form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the

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extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

41. For the purposes of this request, refer to the Company's response to AG-1-355, Attachment 1.
 - a. Confirm that the attached analysis examines a sample of the Company's total pool of residential customers.
 - b. To the extent the Company's response to (a) is in the affirmative, provide a detailed narrative explaining how the Company arrived at its representative sample of residential customers taking service from the utility.
42. For the purposes of this request, refer to the Company's response to AG-1-356. Confirm that there exists no analysis, study, report, or other analytical analysis within the Company's possession that is explicitly responsive to the Attorney General's request.
43. For the purposes of this request, refer to the Company's responses to AG-1-378 and AG1-379.
 - a. Confirm that the Company does not examine the best practices of its affiliates in developing its economic development programs, as "information regarding the economic development activities of Kentucky Power's affiliates in other jurisdictions have no bearing on the Company's economic development activities."
 - c. To the extent the Company's response to (a) is in the negative, provide a detailed narrative explaining how the Company assesses the best practices of its affiliates in developing its economic development programs while not examining individual economic development incentives offered by affiliated electric distribution utilities.
 - c. Confirm or Deny. Does the Company agree that businesses looking to locate in the Company's service territory can decide to locate in the service territory of an affiliate of the Company?
 - d. Confirm or Deny. Does the Company agree that a business looking to locate in a particular location considers the economic development offerings of local utilities along with other economic and non-economic factors?

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- e. Confirm or Deny. Does the Company believe it competes with other utilities, including its affiliates, for new large commercial and industrial customers?
 - f. Provide a detailed narrative explaining why the Company views as irrelevant any examination of the economic development offerings of affiliated utilities when examining the competitiveness of the Company's own economic development offerings.
44. For the purposes of this request, refer to the Company's response to AG-1-396. Identify the party that has final authority to deny K-PEGG grants.
45. Refer to the Company's response to Commission staff request 2-49 and the response to AG 1-2. Provide a copy of the complaints which first named Big Sandy and Rockport, respectively, in litigation which lead to the consent decree(s). This request seeks the a copy of the original pleadings that brought Big Sandy and Rockport into the litigation that led to the consent decrees each are either under, or were under, whether amended or not. Alternatively, an adequate response would indicate the date of the original pleadings, and the case style and number. If no such pleadings exist, provide a detailed narrative why not.
46. Ohio CAT tax refund. Refer to the response to KPSC 1-26.
- a. Has KPCo included Ohio CAT tax as an expense in any of its previous rate cases?
 - i. If not, explain fully why not.
 - ii. If so, identify in which previous rate cases, KPCo has included Ohio CAT tax as a component of its requested revenue requirement, and identify the amounts of Ohio CAT tax included in each such case, from 2008 through the present.
 - b. Why is KPCo not amortizing the \$78,778 Ohio CAT tax refund over a reasonable period of time?
 - c. Identify and provide the amended Oho CAT tax return for 2009 that is related to the refund.
 - d. How much Ohio CAT tax did KPCo record on its books by account for each year 2008 through 2016?

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- e. Identify and provide the supporting documentation for the \$14,498 2014Q4 True-Up amount.
 - f. Identify and provide the supporting documentation for the negative amount of \$2,114,516 of Gross Receipts in Ohio for the 4th Quarter 2016.
 - g. What amount of Gross Receipts in Ohio does KPCo project for 2017?
 - h. Identify and provide the basis for the Commercial Activity Tax Rate of 0.260%.
 - i. For the test year, did the Company record on its balance sheet any amounts uncertain tax positions or FIN 48 impacts that were recorded in account 190? If so, identify, quantify and explain the amounts, and identify the amount of FIN 48 interest associate with each.
47. Has the Company included any amounts in rate base for uncertain tax positions or FIN 48 impacts that were recorded in account 190? If so, identify, quantify and explain the amounts, and identify the amount of FIN 48 interest associated with each.
48. For 2016, did the Company record any amounts of FIN 48 interest on its books? If so, identify, quantify and explain the amounts recorded in each account, and show how the interest was computed, showing the interest rate used, and the balance to which the interest rate was applied, to compute the FIN 48 interest.
49. Did the Company include any FIN 48 interest in its cost of debt? If so, identify, quantify and explain the amounts. If not, explain fully why not.
50. For each regulatory liability that the Company had recorded on its books as of the beginning and end of the test year, provide the following information:
- a. a description of the regulatory liability,
 - b. a citation to the order or other authority relied upon for establishing the regulatory liability.
 - c. the amortization period
 - d. the amount of related expense or income recorded in the test year related to accounting entries related to the regulatory liability.

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51. For each regulatory asset that the Company had recorded on its books as of the beginning and end of the test year, provide the following information:
- a. a description of the regulatory asset,
 - b. a citation to the order or other authority relied upon for establishing the regulatory asset.
 - c. the amortization period
 - d. the amount of related expense or income recorded in the test year related to accounting entries related to the regulatory asset.
52. In the test year did KPCo record any amounts for Cash Surrender Value Earnings? If so, provide the following information:
- a. the amounts recorded by account,
 - b. details on how the recorded amounts were determined,
 - c. comparable amounts for each year, 2012-2016
53. How much storm cost has KPCo requested? Show the amounts for each storm. Also, show the amortizations of storm cost deferrals that KPCo has included in its requested revenue requirement.
54. Rockport Unit 1 SCR. Identify by amount and account all costs related to the Rockport Unit 1 SCR that KPCo has included in its proposed revenue requirement. Include complete supporting details.
55. Refer to the response to AG1-002(r). Identify by amount and account all costs related to the Rockport UPA 12.16% ROE that KPCo has included in its proposed revenue requirement. Include complete supporting details.
56. Refer to the response to AG1-002(q) which indicates that the Rockport Unit 1 SCR went into service on August 9, 2017. Identify, quantify and explain the impact on charges to KPCo for the Rockport UPA from the impact of the Rockport Unit 1 SCR going into service. Include complete supporting details.
57. What is the total amount that KPCo is requesting in the current case for charges related to the Rockport Unit 1 SCR? Show the total and the amounts requested by account

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and by requested rate component (e.g., base rate amount, environmental surcharge amount, etc.)

58. Refer to the response to AG 1-175. Identify, explain and provide the calculations of each of the following:

- a. the \$34 million identified in the response to AG 1-175(d).
- b. the \$5.8 million identified in the response to AG 1-175(e).
- c. the \$6.7 million identified in the response to AG 1-175(f).
- d. the \$3.8 million identified in the response to AG 1-175(h).
- e. the \$3.9 million identified in the response to AG 1-175(i).
- f. the \$9.2 million identified in the response to AG 1-175(j).
- g. the \$5.8 million identified in the response to AG 1-175(k).

59. Refer to the response to AG 1-175(i). Provide calculations of the \$3.9 million environmental compliance expense impact broken out between:

- a. Rockport environmental costs
- b. Mitchell environmental costs
- c. Other environmental costs

Include workpapers and supporting calculations for each.

60. With all Company proposed adjustments, what are the expense amounts that KPCo is requesting, in total and by account, for each of the following components of KPCo incentive compensation:

- a. Incentive Compensation Plan
- b. Restricted Stock Units
- c. Performance Share Incentives?

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Include workpapers and supporting calculations for each.

61. With all Company proposed adjustments, what are the expense amounts that KPCo is requesting, in total and by account, for each of the following components of incentive compensation charged or allocated to KPCo by AEP Service Company:

- a. Incentive Compensation Plan
- b. Restricted Stock Units
- c. Performance Share Incentives?

Include workpapers and supporting calculations for each.

62. Refer to Mr. Carlin's direct testimony at page 20.

- a. Why are the 2015 and 2016 increases above the utility industry median (3.5% each year versus 3.0%)?
- b. Has the Company requested any pay increases for 2017? If so, identify, quantify and explain the 2017 pay increases, and identify the impact on expenses in total and by account.
- c. Has the Company requested any pay increases for 2018? If so, identify, quantify and explain the 2018 pay increases, and identify the impact on expenses in total and by account.
- d. Does the Company have any information regarding how its requested 2017 and 2018 pay increases compare with utility industry increases for 2017 and/or projected increases for 2017 or 2018? If so, identify and provide such information.

63. Refer to Mr. Carlin's direct testimony at page 28.

- a. Identify, quantify and explain fully (1) the 2016 earnings targets and (2) the achieved earnings that result in the "substantially above target score earned for calendar 2016 by Kentucky Power distribution and staff employees."
- b. Does KPCo have any earnings targets for 2017 or 2018? If not, explain fully why not. If so, identify, quantify and explain such earnings targets.

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64. Refer to Mr. Carlin's direct testimony at page 29.

- a. Were any portions of KPCo's incentive compensation disallowed in previous KPCo rate cases? If so, explain.
- b. From 2008 through the present, were any disallowed portions of KPCo's incentive compensation replaced with increases in base pay? If so, identify, quantify and explain all increases in base pay for KPCo employees that have occurred to replace disallowed portions of incentive compensation.
- c. From 2008 through the present, were any disallowed portions of AEP Service Company charges to KPCo for AEP Service Company incentive compensation replaced with increases in base pay for AEPSC employees? If so, identify, quantify and explain all increases in base pay for SEPSC employees that have occurred to replace disallowed portions of incentive compensation.

65. Refer to KPSC 1-66. Was any cost charged or allocated to KPCo or recorded by KPCo during the test year for the HR Committee compensation consultant?

- a. If not, explain fully why not.
- b. If so, identify the amount by account. Also, show the total amount and how it was allocated to KPCo.
- c. Identify and provide a copy of the contract for 2016 and 2017 for the HR Committee outside compensation consultant.

66. Refer to the response to AG 1-303.

- a. How much revenue from Rockport capacity charges did KPCo reflect for the test year?
- b. In what account did KPCo record the Rockport capacity charge revenue amounts that were listed in the response to AG 1-303?

67. Refer to the responses to KIUC 1-43 which included Rockport UPA monthly invoices through July 2017 and AG1-002(q) which states that the Rockport Unit 1 SCR went into service on August 9, 2017. Provide the Rockport UPA monthly invoices for months subsequent to July 2017 that reflect billings when the Rockport Unit 1 SCR was in service.

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68. Refer to the response to AG 1-294.
- a. How did KPCo record the \$3.2 million of Big Sandy severance cost on its books?
 - b. Is any amount for Big Sandy severance being amortized? Over what period? What are the monthly amortization amounts, and in what account is the severance amortization recorded?
 - c. Is any amount of expense for Big Sandy severances included in the Company's requested revenue requirement? If so, how much and in what accounts? Include complete details.
69. Refer to the response to AG 1-294, which indicates that Big Sandy severances took place between December 2014 through January 2016 and reduced wages (including FICA) by \$2.6 million per year. Identify, quantify and explain the amount of reduced payroll related to such severances in each month of that period.
70. Rate Case Expense. Refer to the response to AG_1_128 and Section V, Exhibit 2, W19 from the Company's filing.
- a. Explain fully and in detail why the Company has included 1/3 of its estimated rate case expense for the current case in rate base.
 - b. Section V, Exhibit 2, W19 indicates that the annual average rate case costs totaling \$458,333 is included in O&M expense. Identify by amount and account, the amount of rate case expense that KPCo included in its rate base.
71. Executive Compensation. Refer to the confidential response to KPSC_1_46.
- a. Referring to page 1 of Attachment 1 from the referenced response, for each executive offer listed, state whether the amounts shown under the Test Year Salary column are included in the Company's filing.
 - b. If the answer to part "a" is "yes", state whether the salaries reflect total Company amounts. If so, provide the Kentucky jurisdictional amounts.
 - c. For each period (2014-2016 and the Test Year) shown in Attachment 1 (page 1), provide a breakout of the components that comprise each executive officer's Other Compensation. If the amounts shown on

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Attachment 1 are total Company amounts, provide the Kentucky jurisdictional amounts of each executive officer's Other Compensation.

- d. Pursuant to part "c", if the amounts shown on Attachment 1 are total Company amounts, provide the Kentucky jurisdictional amounts in the breakout of each executive officer's Other Compensation.

72. Operating Expenses. Refer to the response to KPSC_1_23. Subparts a through c of the referenced response requested total Company and Kentucky jurisdictional amounts for the data requested. However, upon reviewing the attachments provided (Attachments 1, 2 and 3), there is only one set of numbers listed on each.

- a. Are the amounts shown on Attachments 1, 2 and 3 total Company numbers? If so, provide the corresponding Kentucky jurisdictional amounts.

73. Payroll Expense. Refer to the response to KPSC_2_018. Explain fully and in detail the purpose of the 0.5% promotion and equity adjustment for nonexempt salaried and exempt employees.

74. Payroll Expense. Refer to Section V, Exhibit 2, page 35 of 60. Explain fully and in detail why the merit increase for nonexempt employees is so much higher at 5.00% than the merit increases shown for exempt and salaried nonexempt employees (3.50%).

75. Payroll Expense. Refer to the response to KSPC_1_24.

- a. Explain fully and in detail why First/Mid Level officials worked 22,226.50 hours of overtime during the test year.
- b. Explain fully and in detail why Technicians worked 17,531.40 hours of overtime during the test year.
- c. Explain fully and in detail why Craft Workers worked 91,079.10 hours of overtime during the test year.
- d. Provide similar regular hours and overtime hours data for each year 2014, 2015 and 2016.

76. Prepaid Pension Asset. Refer to the response to AG_1_055.

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- a. Explain fully and in detail whether the Company has included an amount for a prepaid pension asset in its rate base. If so, identify by amount and account where the prepaid pension asset is reflected in KPCo's filing.
 - b. If the answer to part "a" is "yes", quantify and explain fully and in detail the impact (if any) of the Company's prepaid pension asset in its adjusted capitalization amount of \$1,191,785,493.
77. Pension Expense. Refer to the response to AG_1_084 and Section V, Exhibit 2, W23 from the Company's filing.
- a. Referring to the response to AG_1_084(a), reconcile the \$1,733,323 of net qualified pension expense in the test year to the test year amounts shown for pension expense on Company workpaper W23. Identify, quantify and explain each reconciling item.
78. Pension Expense. Refer to the response to AG_1_110 and Section V, Exhibit 2, W23 from the Company's filing.
- a. Referring to Attachments 1 and 2 from the response to AG_1_110, reconcile the test year pension expense amounts shown for KPCo and AEPSC employees to the test year amounts shown on Company workpaper W23. Identify, quantify and explain each reconciling item.
79. SERP Expense. Refer to the response to AG_1_083 and Section V, Exhibit 2, W23 from the Company's filing.
- a. Reconcile the net test year SERP expense of \$3,409 to the amount shown on Company workpaper W23. Identify, quantify and explain each reconciling item.
 - b. Reconcile the rate effective period SERP expense of \$6,273 to Company workpaper W23. Identify, quantify and explain each reconciling item.
80. OPEB Expense. Refer to the response to AG_1_085 and Section V, Exhibit 2, W23 from the Company's filing.
- a. Reconcile the net test year OPEB expense of (\$1,755,862) to the amount shown on Company workpaper W23. Identify, quantify and explain each reconciling item.

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- b. Reconcile the rate effective period OPEB expense of (\$1,586,749) to Company workpaper W23. Identify, quantify and explain each reconciling item.

81. OPEB Expense. Refer to the response to AG_1_111 and Section V, Exhibit 2, W23 from the Company's filing.

- a. Referring to Attachments 1 and 2 from the response to AG_1_111, reconcile the test year OPEB amounts shown for KPCo and AEPSC employees to the test year amounts shown on Company workpaper W23. Identify, quantify and explain each reconciling item.

82. Advertising Expense. Refer to the response to AG_1_261 and Section V, Exhibit 2, W21.

- a. Reconcile the test year expense of \$34,802 shown on Attachment 1 from AG_1_261 to the \$136,858 shown on Company workpaper W21. Identify, quantify and explain each reconciling item.
- b. Explain fully and in detail the nature of the advertising expense category "Employee Expenses".

83. Uncollectibles Expense. Refer to the response to AG_1_264. Explain fully and in detail whether the \$62,911 accounts receivable charge-off is included in the Company's cost of service. If so, explain fully why and identify by account where this amount is reflected in the Company's filing.

THE FOLLOWING REQUESTS REFERENCE INFORMATION FROM THE 2016 AMERICAN ELECTRIC POWER CONSOLIDATED FEDERAL INCOME TAX RETURN THAT WAS PROVIDED AS A SUPPLEMENTAL RESPONSE TO AG 1-115 ON SEPTEMBER 6, 2017 AND WAS MARKED AS "CONFIDENTIAL" BY THE COMPANY

[BEGIN CONFIDENTIAL]

84. [REDACTED]

85. [REDACTED]

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[Redacted]

86. [Redacted]

a. [Redacted]

b. [Redacted]

c. [Redacted]

d. [Redacted]

87. [Redacted]

a. [Redacted]

b. [Redacted]

88. [Redacted]

89. [Redacted]

a. [Redacted]

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b. [REDACTED]

90. [REDACTED]

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

d. [REDACTED]

e. [REDACTED]

f. [REDACTED]

g. [REDACTED]

91. [REDACTED]

a. [REDACTED]

b. [REDACTED]

92. [REDACTED]

93. [REDACTED]

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a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

94. [REDACTED]

a. [REDACTED]

b. [REDACTED]

95. [REDACTED]

a. [REDACTED]

b. [REDACTED]

c. [REDACTED]

d. [REDACTED]

96. [REDACTED]

a. [REDACTED]

b. [REDACTED]

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c. [Redacted]

d. [Redacted]

97. [Redacted]

a. [Redacted]

b. [Redacted]

c. [Redacted]

98. [Redacted]

a. [Redacted]

b. [Redacted]

99. [Redacted]

a. [Redacted]

b. [Redacted]

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c. [REDACTED]

d. [REDACTED]

**[END DATA REQUESTS THAT CONTAIN REFERENCES TO CONFIDENTIAL
2016 INCOME TAX RETURN MATERIAL]**

**THE FOLLOWING DATA REQUESTS REFER TO OTHER MATERIAL THAT
WAS IDENTIFIED AS BEING "CONFIDENTIAL" BY THE COMPANY:**

100. [REDACTED]

101. [REDACTED]