

**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)	
Plan; (3) An Order Approving Its Tariffs And)	Case No. 2017-00179
Riders; (4) An Order Approving Accounting)	
Practices To Establish Regulatory Assets Or)	
Liabilities; And (5) An Order Granting All Other)	
Required Approvals And Relief)	

**KENTUCKY POWER COMPANY'S DATA REQUESTS TO
THE ATTORNEY GENERAL OF THE COMMONWEALTH OF KENTUCKY**

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Pursuant to the Commission's Order dated July 17, 2017, Kentucky Power Company propounds the following data requests to be answered by the Attorney General of the Commonwealth of Kentucky:

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Attorney General's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "Identify" used in a fashion other than as described in instructions 3-6 above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
8. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
9. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
10. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
11. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
12. "Attorney General" means the Attorney General of the Commonwealth of Kentucky, the Attorney General's Office of Rate Intervention, its employees, its agents, J. Randall Woolridge, Ralph C. Smith, David E. Dismukes, Roger McCann, Acadian Consulting Group, LLC, Community Action Kentucky, Inc., and Larkin & Associates, PLLC.
13. "PJM" means PJM Interconnection.
14. "Company" means Kentucky Power Company.
15. "AEP" means American Electric Power Company, Inc.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

DATA REQUESTS

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

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

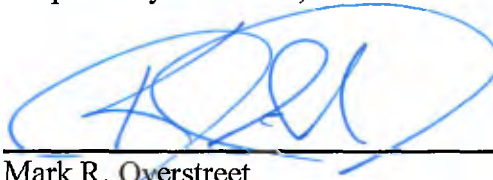
3. To the extent not already provided, please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Woolridge in electronic format, with formulas intact and visible, and no pasted values.
4. To the extent not already provided, please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Woolridge. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Dismukes in electronic format, with formulas intact and visible, and no pasted values.
6. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Dismukes. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
7. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. McCann in electronic format, with formulas intact and visible, and no pasted values.
8. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. McCann. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
9. Please refer to Exhibit JRW-4.1 to the testimony of Mr. Woolridge. Please provide all underlying data and supporting calculations for each column in Exhibit JRW-4.1. Please provide this information for both proxy groups shown in the exhibit. The requested information should be provided in an electronic format, with formulas intact and visible, and no pasted values.
10. Please refer to page 3, lines 1-2, of the testimony of Mr. McCann. Please identify with specificity each instance where the opinions expressed in the testimony of Mr. McCann differ from that of the Office of Attorney General.
 - a. For each instance where the opinions expressed in the testimony of Mr. McCann differ from that of the Office of Attorney General, identify how the opinions differ.
11. Please refer to page 70, lines 15-17, of the testimony of Mr. Smith where Mr. Smith claims that “many companies in Kentucky are either not paying wage increases, or for those that are, the increases are significantly less than KPCo’s proposed 3.5% merit increase.”

- a. Please identify all facts that support Mr. Smith's claim.
 - b. Please provide copies of all studies reviewed or relied upon by Mr. Smith to support this claim.
 - c. Please identify the companies referred to by Mr. Smith that are not providing wage increases.
 - d. Please identify the companies referred to by Mr. Smith as providing "increases significantly less than" Kentucky Power.
 - e. For each company that Mr. Smith identified in response to subparts c. and d. above please provide the annual rate of pay increases from 2009 through 2016.
12. Please refer to page 64, lines 9-11, of the testimony of Mr. Smith where Mr. Smith testifies that, "[b]ut for the AEP Consent Decree, the retirement of Big Sandy Unit 2, and the purchase of the 50 percent undivided interest in the Mitchell Plant by KPCo might not have been necessary."
- a. Please provide all facts that support Mr. Smith's assertion that the AEP Consent Decree was a "but for" cause of the retirement of Big Sandy Unit 2 and the acquisition by Kentucky Power of an undivided 50 percent interest in the Mitchell Plant.
 - b. Please confirm that in Case No. 2011-00401 the Attorney General opposed Kentucky Power's proposal to retrofit Big Sandy Unit 2 with a flue gas desulfurization unit.
 - c. Please confirm that Kentucky Power could not, consistent with the Mercury and Air Toxic Standards Rules, continued to operate Big Sandy Unit 2 after April 16, 2015 absent the installation of a flue gas desulfurization unit.
 - d. Confirm that it is Mr. Smith's testimony that absent the AEP Consent Decree the Company would not have been required to perform the resource disposition analysis that resulted in Case No. 2012-00578.
13. Please confirm that the Attorney General is authorized under the rules of the Federal Energy Regulatory Commission ("FERC") to challenge the return on equity established in the FERC-approved Rockport Unit Power Agreement.
14. Please refer to page 70, lines 9-14, of the testimony of Mr. Smith. Confirm that Mr. Smith's testimony described therein is based solely on advice of counsel.
- a. If there exist independent bases to support Mr. Smith's testimony set forth on page 70, lines 9-14, please identify those bases.

- b. If there exist independent bases to support Mr. Smith's testimony set forth on page 70, lines 9-14, please provide all supporting documentation in support of those independent bases.
15. Please refer to Exhibits DED-4 and DED-6 to Mr. Dismukes' testimony.
 - a. Please identify the bases for selecting the peer utility group used in those exhibits.
 - b. For each utility identified, please identify the number of customers per distribution line mile and the nature of the terrain (i.e. mountainous, urban, agrarian, etc.) within the utility's service territory.
16. Please refer to page 20, lines 12-17, of the testimony of Mr. Dismukes. Please confirm that electric substations and line transformers are necessary to provide electric service to customers served by a distribution system.
17. Please refer to page 20, line 22, and page 21, lines 1-3, of the testimony of Mr. Dismukes. Please identify all utility regulatory commission decisions that have limited customer charges to the customer-related costs identified therein.
18. Please refer to page 48, lines 13-18, of the testimony of Mr. Dismukes.
 - a. Please identify each discount that Mr. Dismukes alleges the Company provides to customers or third party entities through the K-PEGG program.
 - b. Please provide all documents or other evidence evidencing the existence of each such alleged discount.
19. Please refer to page 52, lines 1-8, of the testimony of Mr. Dismukes.
 - a. Please identify each indicator referred in Mr. Dismukes' statement that "there are plenty of indicators that show previous economic hardship mirroring eastern Kentucky has subsided...." For each such indicator provide the following:
 - (i) the full name of the indicator;
 - (ii) the entity or organization publishing or compiling the indicator;
 - (iii) the beginning and ending points during which the indicator demonstrated the "previous economic hardship mirroring eastern Kentucky has subsided..."; and
 - (iv) copies of all source documents containing the indicator and used in making the referenced statement.
 - b. Please identify each indicator referred in Mr. Dismukes' testimony that "there are plenty of indicators ... and that the region may even be seeing some moderate growth potential." For each such indicator provide the following:

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- (i) the full name of the indicator;
 - (ii) the entity or organization publishing or compiling the indicator;
 - (iii) the beginning and ending points during which the indicator demonstrated “the region may even be seeing some moderate growth potential.”;
 - (iv) copies of all source documents containing the indicator and used in making the referenced statement; and
 - (v) The size of the “growth potential” and the period over which it is anticipated to continue.

Respectfully submitted,



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