

**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 KENTUCKY LEAGUE OF CITIES**

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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 Kentucky League of Cities:

**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 of 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 KLC'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. "KLC" means the Kentucky League of Cities, its employees, its agents, its members identified in Paragraph 2 of its July 12, 2017 motion to intervene in this proceeding, Jeffry Pollock, and J. Pollock, Incorporated.
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.

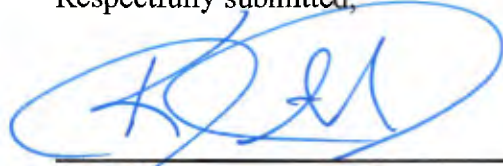
#### **DATA REQUESTS**

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Mr. Pollock 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. Pollock. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please provide a copy of KLC's bylaws, articles of incorporation, and any other documents that detail the organization's operations including, without limitation, any documents that describe KLC's authority to speak on behalf of any of its member municipalities.

4. Please refer to page 1, lines 18-19, of the testimony of Mr. Cooper.
  - a. Please identify which of the 29 cities referenced there are members of KLC.
  - b. Please identify each municipality on whose behalf KLC is appearing in this proceeding.
  - c. For each municipality upon whose behalf KLC is appearing in this action please provide a copy of the ordinance, resolution, or other official action authorizing KLC to appear in this action upon behalf of the city.
  - d. For each city identified above, please confirm that each of the cities authorized KLC to take the positions set forth in the testimony of Mr. Pollock.
  - e. For each city that has authorized KLC to take the positions set forth in the testimony of Mr. Pollock, please provide any written evidence that the city has authorized KLC to take the positions set forth in the testimony of Mr. Pollock.
5. Please refer to page 1, line 23, and page 2, lines 1-2, of the testimony of Mr. Cooper.
  - a. Please provide a copy of each correspondence from cities reviewed by Mr. Cooper.
  - b. For each correspondence reviewed by Mr. Cooper, please confirm whether the author of the correspondence had the authority to speak on behalf of the city.
  - c. For each correspondence reviewed by Mr. Cooper where the author had the authority to speak on behalf of the City, please provide all documents that support the author's authority to speak on behalf of the City.
6. Please refer to page 3, lines 12-14, of the testimony of Mr. Cooper.
  - a. Please identify which Paintsville city officials Mr. Cooper communicated with regarding the claimed confusion over calculation of electricity rates.
  - b. Please provide a copy of all communications between Mr. Cooper and Paintsville city officials regarding the claimed confusion.
  - c. Please identify any communications by Paintsville city officials and employees of Kentucky Power to address the claimed confusion.
7. Please refer to Exhibits JLP-1, JLP-2, and JLP-3 to the testimony of Mr. Pollock. Please confirm that the proposed revenue requirement increase for Kentucky Power utilized by Mr. Pollock is the proposed revenue requirement increase initially filed by Kentucky Power and not the updated and reduced proposed revenue requirement filed by Kentucky Power on August 7, 2017.

8. Please confirm that the position advocated for by KLC would result in higher electricity rates for residential customers than those proposed by Kentucky Power.

Respectfully submitted,



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COMPANY