

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO.
CONSTRUCT A 161 KV TRANSMISSION LINE)	2017-00328
IN PERRY AND LESLIE COUNTIES,)	
KENTUCKY AND ASSOCIATED FACILITIES)	

ATTORNEY GENERAL'S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Initial Data Requests to Kentucky Power Company (hereinafter “KPCo” or the “Company”) to be answered by January 29, 2018, 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 requested 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.
- (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, please request clarification directly from undersigned 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, please 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, and in accordance with Commission direction.

(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, please 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.

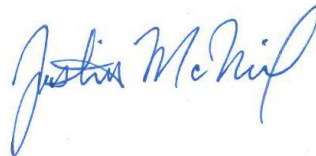
(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(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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ATTORNEY GENERAL



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1. Refer to Wohnhas Testimony pg. 4. Explain, using the Company's best available knowledge and estimation, the future scope of the Eastern Kentucky Transmission Program.
 - a. Explain how many total projects the Company intends to undertake in this program.
 - b. Explain how much of the program is likely to be focused on projects designated Baseline versus those considered Supplemental, as defined by PJM.
 - c. Explain whether the Company has already identified future projects to be completed under this program, and how those projects were identified. If so, provide such projects and a description of each.
 - d. Refer to Lasslo Testimony pg. 10. Explain whether the Company exclusively relies on the PJM annual RTEP to identify future projects for this program, or if it also uses internal reviews for such. If internal reviews are also used, describe the factors and methodology which comprise these reviews, and the outcomes of the reviews.
2. Refer to Application pg. 4, Wohnhas Testimony pgs. 5, 9, and Larson Testimony pg. 8. Explain whether the Company expects to receive substantial monetary savings or see increased efficiencies and reliability from combining portions of the existing Hazard-Jackson 69 kV Transmission Line and the Hazard-Wooton 161 kV Transmission Line into a 1.15 mile double-circuit line as part of the rebuild.
 - a. If so, state the amount of any such benefits and explain the extent of the same.
 - b. Explain whether there are any inherent risks or inefficiencies from the double-circuit configuration.
3. Explain in detail the Company's projected useful life for the rebuilt Hazard-Wooton 161 kV line.
4. Refer to the Application pg. 6, 14. Explain the projected rationale and methodology the Company will use to determine whether, and when, to upgrade the double-circuit portion of the line to 138 kV, to provide increased capacity for future new load.
5. Refer to Wohnhas Testimony pgs. 16–17 and Lasslo Testimony pg. 12. Explain in detail how much of the proposed project is considered Baseline and how much is considered Supplemental, as defined by PJM.
 - a. Explain whether the additional station work, which appears to total \$13 million, is all considered Supplemental.
6. State whether this project has a cost cap. If so, explain the parameters of the cost cap in detail. If not, explain why not.

7. State whether the Company has planned or intends to use a competitive bidding process in order to select the firm or firms to complete the construction of the project.
 - a. If so, explain the selection criteria in detail, explain the rationale for any bids already awarded, and provide copies of any bids received and Requests For Production prepared for this project.
 - b. If not, explain why not.