

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 SUPPLEMENTAL 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 Supplemental Data Requests to Kentucky Power Company (hereinafter “KPCo” or the “Company”) to be answered by February 9, 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.

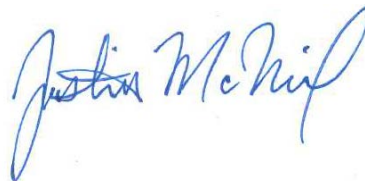
(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(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,

ANDY BESHEAR  
ATTORNEY GENERAL



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1. Refer to the Company's Response to Staff's Initial Request for Information ("RFI") Question 4. Explain whether the estimated OATT revenue requirement of \$5.9 million includes the cost of this project.
  - a. State whether the approximate \$300,000 in annual NITs cost (of the \$5.9 million revenue requirement) is what the Company estimates it will pay after the completion of this project. If not, explain what the Company expects to pay in annual NITs costs.
  - b. Refer to the Company's Response to the Attorney General's Initial RFI Question 5, where the Company estimates that approximately \$20 million of the cost of the project is Baseline, while \$24.5 million is Supplemental. Assuming these project costs are approved, explain whether the Company has calculated the rate impact on customers of each class.
  - c. Considering all transmission costs (total and this project), and using the Company's best estimate, state the current allocation of these costs across rate classes, and fully explain the reasoning behind the allocation.
  - d. Provide a breakdown of the total allocation according to the Supplemental and Baseline portions of the project.
  - e. Describe the projected cost allocation of the projects listed in the Company's Response to the Attorney General's Initial RFI Question 1.c.
  
2. Refer to the Company's Response to the Attorney General's Initial RFI Question 1.d. State whether the PJM RTEP mandated the Supplemental portion of the project costs. Explain fully.
  - a. Identify and provide copies of any documents internal to KPCo and/or any of its affiliates which identify any Supplemental transmission projects slated for construction within: (i) KPCo's service territory, and (ii) any part of the Commonwealth of Kentucky not within KPCo's service territory.
  - b. Discuss the measures KPCo and/or any of its affiliates have taken to facilitate the timely and meaningful input and participation of customers and stakeholders in the development of transmission plans.
  - c. Discuss whether KPCo provided opportunity through PJM's Subregional RTEP Committee for stakeholders to review and comment on the criteria, assumptions, and models used with regard to the proposed project.
  - d. Provide any and all documentation indicating the measures KPCo and/or any of its affiliates have taken to ensure the project complies with FERC Order 890.
  - e. State whether KPCo and/or any of its affiliates have disclosed to all stakeholders the basic criteria, methodologies, assumptions, processes, and data that underlie the transmission plans of KPCo and/or its affiliates.
  - f. Discuss how this specific project, the Hazard-Wooton Line, fits into PJM's regional transmission planning process.
  - g. Provide either a web link to, or a hard copy of the Local Plan upon which KPCo and/or any of its affiliates are currently relying.
  - h. Confirm that the Local Plan KPCo and/or any of its affiliates are currently relying upon has been reviewed by a Subregional RTEP Committee.

- i. Identify any and all meetings of the Subregional RTEP Committee, including location, times and places in which the proposed project, and any other KPCo Supplemental transmission projects scheduled anywhere within the Commonwealth of Kentucky were discussed and held open for comments of customers and stakeholders.
3. Refer to the Company's Response to the Attorney General's Initial RFI Question 1.b, where it states that "[t]he focus of the Eastern Kentucky Transmission Program is the rehabilitation of existing lines and facilities and thus encompasses transmission needs that fall outside of PJM baseline criteria." Also refer to the Company's Response to the Attorney General's Initial RFI Question 1.d, where it states that "[t]he Eastern Kentucky Transmission Program is not limited to either baseline or supplemental projects."
  - a. Explain whether the Company's Eastern Kentucky Transmission Program is designed to focus on transmission projects which are largely Supplemental as defined by PJM.
  - b. Provide the criteria used to determine which "existing lines" are in need of "rehabilitation" and how the Company determines the priority of those lines.
4. Refer to the Company's Response to the Attorney General's Initial RFI Question 6. Explain fully the internal review and approval process which would authorize the Company to exceed the budget for this project.
  - a. Provide any and all documentation which details this review and approval process, and state the employee(s) and company officers of both KPCo and any of its affiliates who would make the necessary approvals. For each such individual, identify their name, job title and employer.
  - b. State whether AEP has a policy which KPCo and its affiliates must use to gain such approval and explain any such policy.
  - c. Does the Company make the Commission aware of initial budget and final costs of transmission projects when requesting cost recovery from the Commission or FERC?
5. Refer to the Company's Response to the Attorney General's Initial RFI Question 1.c. State whether the proposed project, and/or any of the additional projects the Company identified, contain or will contain a cap on project revenue requirements, either in whole or in part. If so, provide documentation and an explanation describing same.
6. Refer to the Company's Response to the Attorney General's Initial RFI Question 1.c. State whether any of the Company's planned transmission projects are classified as NERC Critical Infrastructure Projects (also known as "CIP 14").