

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 ON REHEARING

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 on Rehearing to Kentucky Power Company (hereinafter “Kentucky Power” or the “Company”) to be answered by May 21, 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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1. Refer to Kentucky Power’s Motion for Partial Rehearing, pgs. 8–9.
 - a. Fully explain whether the Company considers all projects designated “Supplemental” to be “every bit as necessary as those Baseline projects approved by the Commission.”
 - b. Fully explain whether, and if so how, the Company prioritizes Supplemental projects.

2. Refer to Kentucky Power Company’s Brief in Support Of Its Application, pgs. 5–7. The Company stated:

[t]he need for and utility of the proposed project were identified and confirmed using the PJM annual Regional Transmission Expansion Plan (“RTEP”) process and Kentucky Power (“AEP Guidelines for Transmission Owner Identified Needs[sic]) transmission planning criteria.

The Company went on to state:

[f]urther, the Supplemental portions of the project were presented to stakeholders for review at the November 2, 2017 and December 18, 2017 Subregional Committee meetings. As a result of this process, the Project and its components represent the most appropriate, cost-effective, and efficient means of meeting the applicable planning criteria and identified transmission system needs.

In the Direct Testimony of Mr. Michael G. Lasslo, Mr. Lasslo stated that:

[s]upplemental projects are identified and selected to address AEP transmission needs that are not covered by the PJM transmission planning criteria, are submitted to PJM to conduct a no-harm review, and are vetted with stakeholders through the TEAC and Sub-Regional RTEP Committees prior to being included in the RTEP. To ensure that the Supplemental project needs are clearly understood by stakeholders, they also are vetted with stakeholders through both PJM and AEP-hosted stakeholder meetings. This transparent planning and vetting process ensures that the Baseline and Supplemental projects that are incorporated into the RTEP are the appropriate, most efficient, and cost effective solutions to the planning criteria and system needs that have been identified and should be addressed for the benefit of customers.

- a. Refer to the Company’s Reply to Attorney General’s Response to the Company’s Motion for Partial Rehearing, pgs. 9–10. In light of the preceding statements, fully explain how the Company did not rely on the PJM RTEP stakeholder review process to demonstrate its full consideration of stakeholder input in furtherance of the Supplemental project’s necessity.

- b. Confirm the dates on which the Supplemental portion of this project was presented to PJM or its committees and sub-committees.
- c. Provide a copy of the February 15, 2018 FERC Order in FERC docket Nos. EL16-71-000, ER17-179-000.