

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)	
PERFORM UPGRADE, REPLACEMENT, AND)	CASE NO. 2019-00154
INSTALLATION WORK AT ITS EXISTING)	
SUBSTATION FACILITIES IN PERRY AND)	
LESLIE COUNTIES, KENTUCKY)	

**ATTORNEY GENERAL’S RESPONSE TO
MOTION FOR INFORMAL CONFERENCE**

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby responds to Kentucky Power Company’s (“Kentucky Power”) Motion for Informal Conference (“Motion”). Although the Attorney General does not object to the informal conference, he provides this response for the Commission’s consideration in ruling on the Motion. In its Motion, Kentucky Power states, “The purpose of the informal conference is to provide staff and any parties with an opportunity to view the substation and its condition, along with many of the elements that are the subject of Kentucky Power’s application in this matter.”¹ Undersigned counsel was part of a group of stakeholders who previously sought a site visit to a different AEP (Kentucky Power’s parent company) transmission structure. AEP employee, and witness in this matter, Kamran Ali stated that, “AEP does not support site visits designed to be technical inspections of specific facilities by stakeholders.”² Now, with Kentucky Power’s pending Motion, it appears Mr. Ali’s statement is no longer true. Indeed, Kentucky

¹ Motion for Informal Conference at 1.

² See email response Attached as Exhibit 1 to Attorney General’s Response to Motion for Informal Conference.

Power's Motion makes clear that the informal conference will be a technical inspection. It appears that AEP will support site visits designed to be technical inspections (and even allow questions) but only in instances where AEP believes such a visit will be beneficial to its interests. In determining whether to grant Kentucky Power's Motion, the Commission must consider the standard such a decision creates.

Respectfully submitted,

ANDY BESHEAR
ATTORNEY GENERAL



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Exhibit 1

Chandler, Kent A (KYOAG)

From: Kamran Ali <kali@aep.com>
Sent: Wednesday, May 1, 2019 10:55 AM
To: Ryan Dolan
Cc: Chandler, Kent A (KYOAG); Ed Tatum; Lisa McAlister; Nicolas C Koehler; Kelly D Pearce; Amanda R Conner
Subject: RE: Site Visit For Robinson Park - Haviland 138kV

Ryan, et. al.,

Thanks for your recent inquiry concerning conducting a site visit to the subject line. AEP does not support site visits designed to be technical inspections of specific facilities by stakeholders. We believe such visits pose a number of significant risks and challenges and go well above and beyond the requirements of the M-3 process approved by FERC. Having said that, AEP believes it is important to educate our stakeholders in how we collect information concerning transmission line conditions for asset renewal projects. We will, therefore, be developing a one-time educational event at a selected site that provides stakeholders an opportunity to understand our asset inspection process and ask questions. We believe such an event would be of interest to other stakeholders and we would therefore expand the invitation to include others. Setting up such an event requires many considerations and it will take some time to define the specific site and the event details so that it can be done safely, legally and cost effectively. We will be back in contact with you once we have developed the event details. Please let Kelly and/or me know if you have questions.



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From: Ryan Dolan <rdolan@amppartners.org>
Sent: Tuesday, April 23, 2019 2:03 PM
To: Kamran Ali <kali@aep.com>
Cc: Chandler, Kent A (KYOAG) <Kent.Chandler@ky.gov>; Ed Tatum <etatum@amppartners.org>; Lisa McAlister <lmcalister@amppartners.org>; Nicolas C Koehler <nckoehler@aep.com>
Subject: [EXTERNAL] Site Visit For Robinson Park - Haviland 138kV

This is an **EXTERNAL** email. **STOP. THINK** before you **CLICK** links or **OPEN** attachments. If suspicious please click the 'Report to Incidents' button in Outlook or forward to incidents@aep.com from a mobile device.

Kamran,

I'm reaching out to see if we would be able to schedule a site visit AEP to review the line noted in the subject line. Additionally, attached are some photos of structures that we think are of interest to us. These are all along the 138kV corridor noted in the "Need" statement.

















