

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 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 October 28, 2019, 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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JUSTIN M. McNEIL  
KENT A. CHANDLER  
LAWRENCE W. COOK  
REBECCA W. GOODMAN  
ASSISTANT ATTORNEYS GENERAL  
700 CAPITOL AVE, SUITE 20  
FRANKFORT, KY 40601-8204  
PHONE: (502) 696-5453  
FAX: (502) 564-2698  
[Justin.McNeil@ky.gov](mailto:Justin.McNeil@ky.gov)  
[Kent.Chandler@ky.gov](mailto:Kent.Chandler@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Rebecca.Goodman@ky.gov](mailto:Rebecca.Goodman@ky.gov)

Electronic Application of Kentucky Power Company for a Certificate of Public Convenience and Necessity to Perform Upgrade, Replacement, and Installation Work at its Existing Substation Facilities in Perry and Leslie Counties, Kentucky  
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1. Refer to Kentucky Power's response to Staff DR 1-5 (a). Explain in detail the system conditions or causes of the electrical discharges of high energy, thermal faults, stray gassing and overheating that have led to the need for Transformer #1 and #2 to be replaced earlier than their projected life expectancy.
2. Refer to Kentucky Power's response to Staff DR 1-5 (b). Fully explain the primary causes of the circuit breaker faults discussed.
3. Refer to the two requests above. Explain in detail how Kentucky Power will address the underlying causes or system conditions that have led to the premature retirement of certain equipment following the completion of the proposed projects.
4. Refer to Attachment 1 to Kentucky Power's response to Staff DR 1-8. For each "Work Description" item that is only "Needed to comply with existing PJM and Kentucky Power design standards," provide and fully explain the design standards requiring compliance.
5. Refer to Kentucky Power's response to AG DR 1-1. Which Kentucky wholesale customers are invited to the Annual Stakeholder Summit?
6. Refer to Kentucky Power's response to AG DR 1-6, wherein, when asked whether any work subject to the Application had begun, Mr. Wohnhas responded that "Construction has not started for the components listed within this application." Confirm that the Company has not begun any permitting processes applicable to the work subject to this Application.
7. Refer to Kentucky Power's response to AG DR 1-8, wherein when asked to explain, in detail, the procedure by which PJM review projects designated as Supplemental, the Company merely referred to testimony that is not responsive to the request. Refer also to Kentucky Power's response to AG DR 1-21 (c), wherein the Company answered in the affirmative that PJM reviews the need underlying a Supplemental Project.
  - a. Explain, in detail, the process and depth of the process by which PJM reviews the need underlying a Supplemental Project and the Supplemental Project itself. Any response should include a description of when during PJM's review of Supplemental Projects that PJM conducts a no harm analysis. A mere reference to testimony is not an adequate response.

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8. Refer to Kentucky Power's response to AG DR 1-17. Based on the answer provided, fully explain how Kentucky Power protects the interest of its customers regarding transmission planning when those interests are at odds with affiliates or the rest of the AEP East transmission system.
9. Refer to Kentucky Power's response to AG DR 1-18, wherein when requested to explain the standards that were referenced in Mr. Ali's testimony, Mr. Ali merely provided a link to the entirety of PJM's 3000+ page Open Access Transmission Tariff. Confirm that the industry and RTO standards that were referenced in Mr. Ali's testimony, page 6, were stated to have been "set forth in the PJM Operating Agreement."
10. Refer to KPCo's response to AG-1, Item 9, subpart c.
  - a. Identify and explain in detail any part of the current CPCN application where the Company declined to upgrade certain equipment or declined to pursue a certain solution because such upgrade or solution would not be considered cost-effective.
  - b. Explain how KPCo balances the cost-effectiveness portion of this equation against the other factors.
11. Refer to KPCo's response to AG-1, Item 23, discussing how:

[a]ll of the equipment to be installed as part of the Project has a long useful life expectancy, often measured in decades. Such long useful life expectancies are consistent with the Company's experience with comparable equipment and facilities, which in some cases can exceed their expected life expectancies by many years, and in some cases decades.

  - a. Refer further to the Application, page 11. Fully explain the Company's approach of noting equipment possibly exceeding its useful life expectancy by decades as a positive outcome in the response above, while in the Application for this project it described such equipment that has exceeded its useful life and is no longer supported by the manufacturer as in need of immediate replacement.
  - b. At what point do manufacturers stop supporting equipment? How long do third-party suppliers support equipment with non-OEM parts?
  - c. Explain whether there is any difference between the terms "useful life expectancy" and "projected operating life."