

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

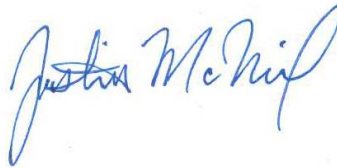
ELECTRONIC APPLICATION OF KENTUCKY )  
POWER COMPANY FOR A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND NECESSITY TO )  
PERFORM UPGRADE, REPLACEMENT, AND ) CASE NO. 2019-00154  
INSTALLATION WORK AT ITS EXISTING )  
SUBSTATION FACILITIES IN PERRY AND )  
LESLIE COUNTIES, KENTUCKY )

**ATTORNEY GENERAL’S RESPONSE TO KENTUCKY POWER COMPANY’S DATA  
REQUESTS**

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits the following responses to data requests from Kentucky Power Company (“KPCo”) in the above-styled matter.

Respectfully submitted,

ANDY BESHEAR  
ATTORNEY GENERAL



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JUSTIN M. McNEIL  
LAWRENCE W. COOK  
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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  
Attorney General's Responses to Kentucky Power Company's Data Requests  
Case No. 2019-00154

WITNESS/RESPONDENT RESPONSIBLE:

Counsel

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QUESTION No. 1

Please identify each exhibit, document, or demonstrative of any kind that the Attorney General intends to introduce or use in any fashion with a witness at any evidentiary hearing in this matter. For each such exhibit, document, or demonstrative please provide the following:

- (a) A copy of the exhibit, document, or demonstrative;
- (b) The identity, including name, employer, and position of each person who participated in the creation of the exhibit, document, or demonstrative. If the exhibit, document, or demonstrative was created by a third-party not associated with or assisting the Attorney General in this matter, including any governmental entity, Kentucky Power, or its affiliates, it will be sufficient to state the identity of the third-party creator.

RESPONSE:

Insofar as KPCo's data requests refer to documents, exhibits, or demonstratives the Attorney General may use in the cross-examination of KPCo witnesses, the Attorney General objects. Notwithstanding this objection, the Attorney General does not plan on calling any witness, for direct examination or any other purpose, at any evidentiary hearing in this matter. As such, there are no responsive documents to KPCo's request.