

Kentucky Power Company
KPSC Case No. 2020-00174
Walmart's Initial Set of Data Requests
Dated August 11, 2020

DATA REQUEST

Walmart_1 Please provide the Company's initial and revised responses to all formal or
_001 informal requests for information made by any party to this proceeding when that response is provided to the requesting party, including any responses already provided to any party.

RESPONSE

Objection. Kentucky Power on May 29, 2020 filed its notice of election to use electronic filing procedures. Walmart was granted intervention by Order dated July 14, 2020. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission." Walmart thus is required by the Commission's regulations to view or download the requested information from the Commission's website. To the extent the requested information was filed prior to July 14, 2020, the requested information is available at <http://psc.ky.gov> and is equally accessible to Walmart.

Prepared by Counsel

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DATA REQUEST

Walmart_1 To the extent the Company files corrections, revisions, amendments, supplemental information, and/or errata to its originally filed case, please
_002 provide all updated materials including the Company's testimony, exhibits, schedules, workpapers and models.

RESPONSE

Objection. Kentucky Power on May 29, 2020 filed its notice of election to use electronic filing procedures. Walmart was granted intervention by Order dated July 14, 2020. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission." Walmart thus is required by the Commission's regulations to view or download the requested information from the Commission's website. To the extent the requested information was filed prior to July 14, 2020, the requested information is available at <http://psc.ky.gov> and is equally accessible to Walmart.

Prepared by Counsel

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DATA REQUEST

Walmart_1 Please provide all workpapers, in electronic spreadsheet format with
_003 formulas intact, whereavailable, supporting each of the figures, tables, and
exhibits accompanying the Company's filing and supporting testimony.

RESPONSE

Please see Kentucky Power's response to KPSC 3-1. To the extent this request seeks the production of information beyond that provided in response to KPSC 3-1, the Company objects to the request as requiring the creation of information in a form that it does not exist, or as imposing an obligation that is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Witness: Brian K. West

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DATA REQUEST

Walmart_1 Please provide copies of all rate design workpapers in electronic format
_004 with all formulas intact, including but not limited to, those set forth in
Exhibit AEV-1 to the Direct Testimony of Alex Vaughan.

RESPONSE

Please see Kentucky Power's response to KPSC 3-1. To the extent this request seeks the production of information beyond that provided in response to KPSC 3-1, the Company objects to the request as requiring the creation of information in a form that it does not exist, or as imposing an obligation that is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Witness: Brian K. West

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DATA REQUEST

Walmart_1 Please provide copies of any cost of service studies in electronic format
_005 with all formulas intact, including the class cost of service study referenced in Company witness Stegall's testimony as Exhibit JMS-1, and the jurisdictional cost of service study attached as Section V to the Company's filing.

RESPONSE

Please see Kentucky Power's response to KPSC 3-1. To the extent this request seeks the production of information beyond that provided in response to KPSC 3-1, the Company objects to the request as requiring the creation of information in a form that it does not exist, or as imposing an obligation that is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Witness: Brian K. West

VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is Director Regulatory Services for Kentucky Power Company that he has personal knowledge of the matters set forth in the forgoing responses and the information contained therein is true and correct to the best of his information, knowledge and belief after reasonable inquiry.



Brian K. West

COMMONWEALTH OF KENTUCKY

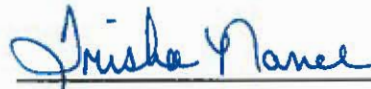
)

) Case No. 2020-00174

COUNTY OF BOYD

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Subscribed and sworn to before me, a Notary Public in and before said County and State, by Brian K. West, this 24th day of August 2020.



Notary Public

Notary ID Number: 632421

My Commission Expires: 9-26-2023

