

Kentucky Power Company
KPSC Case No. 2020-00174
AG-KIUC First Set of Data Requests
Dated August 12, 2020

DATA REQUEST

AG_KIUC_1_029 Please provide the amount of Supplemental Executive Retirement Plan (“SERP”) expense incurred in the test year and the amount included in the revenue requirement. Provide the SERP expense directly incurred by Kentucky Power Company and the SERP expense charged to the Company from each other affiliate.

RESPONSE

Adjustment W21 at Section V, Exhibit 2, page 22 adjusts pension and other post retirement benefit costs (including SERP costs) for known changes from the test year, and is attributable only to Kentucky Power employees. Please refer to KPCO_R_KIUC_AG_1_029_Attachment1 for the amount of SERP expense attributable to Kentucky Power employees incurred in the test year (Line No. 17) and the amount included in the revenue requirement (Line No. 6)

SERP expense charged to the Company by AEPSC during the test year ended March 31, 2020 and included in the revenue requirement was \$198,807.

Witness: Brian T. Lysiak

Witness: Andrew R. Carlin

November 12, 2020 Supplemental Response

Witness: Heather M. Whitney

Witness: Andrew R. Carlin

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DATA REQUEST

AG_KIUC_1_049 Provide a narrative that explains, for each of the AEP Transmission Companies (e.g., AEP Kentucky Transmission Company) how the transmission investment associated with that Company is designed to meet the needs of the AEP customers in the state in which such investment is located versus the needs of all customers utilizing the AEP East transmission system on an integrated basis. In particular, please provide an estimate of the percentage of transmission plant investment for each such AEP Transmission Company that would otherwise have been made by the corresponding AEP Operating Company (e.g., Kentucky Power Company, in the case of AEP Kentucky Transmission Company) had the AEP Transmission Company not existed.

RESPONSE

The Company objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead the discovery of admissible evidence in this case, in that it purports to seek information about Kentucky Power's affiliates who are not entities subject to the jurisdiction of the Commission and who do not provide retail service in Kentucky Power's service territory or anywhere else in the Commonwealth of Kentucky. The Company further objects to this request to the extent it seeks information about FERC-jurisdictional transmission rates which are beyond the control of Kentucky Power and determined pursuant to applicable FERC-approved tariffs. Subject to, and without waiving, these objections, the Company states as follows:

The AEP Zone is comprised of ten AEP operating or transmission companies, including Kentucky Power. This transmission network is interconnected to additional regional transmission facilities. These interconnected transmission systems are necessary and allows for the economical and reliable delivery of electric power for all customers within the AEP Zone and beyond. Planning and operation of the system is integrated through the coordinated efforts of the AEP Transmission Department, who works closely with neighboring utilities, other interconnected entities, and PJM to plan and operate the transmission grid. Each company is required to operate and maintain their respective transmission infrastructure based on industry regulations and good utility practices to the benefit of customers in each state and throughout the AEP Zone.

Witness: Nicolas C. Koehler

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November 12, 2020 Supplemental Response

Witness: Kamran Ali

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DATA REQUEST

AG_KIUC_1_051 With regard to the AEP Ohio Transmission Company, and the AEP Indiana Transmission Company, please provide the driving factors causing the increase in transmission investment during the past 5 years.

RESPONSE

The Company objects to this request on the grounds that it is overly broad and not reasonably calculated to lead the discovery of admissible evidence in this case, in that it purports to seek information about Kentucky Power's affiliates who are not entities subject to the jurisdiction of the Commission and who do not provide retail service in Kentucky Power's service territory or anywhere else in the Commonwealth of Kentucky. The Company further objects to this request to the extent it seeks information about FERC-jurisdictional transmission rates which are beyond the control of Kentucky Power and determined pursuant to applicable FERC-approved tariffs. The Company further objects to the request on the ground that it purports to seek information about transmission investments that are not within the control of Kentucky Power, and which are regulated and governed by commissions and government entities different from the Commission and outside the Commonwealth of Kentucky. Subject to, and without waiving, these objections, the Company states as follows:

The driving factors for increased transmission investment in the AEP transmission Zone generally fall under two categories in PJM: Baseline projects and Supplemental projects. Baseline projects address criteria violations identified on the grid. Supplemental projects address a multitude of needs including asset renewal, operational efficiency, performance, and hardening of the grid. In recent history, transmission investment has addressed, among others, system needs arising from retirement of generation sources due to environmental regulations. Additionally, the transmission system requires substantial investment to address aging infrastructure, cyber and physical security threats, and modernization of protection and control equipment.

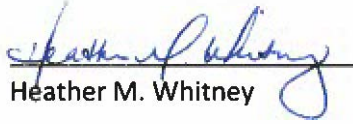
Witness: Nicolas C. Koehler

November 12, 2020 Supplemental Response

Witness: Kamran Ali

VERIFICATION

The undersigned, Heather M. Whitney, being duly sworn, deposes and says she is the Director in Regulatory Accounting Services for American Electric Power Service Corporation that she 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 her information, knowledge and belief after reasonable inquiry.


Heather M. Whitney

STATE OF OHIO

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) Case No. 2020-00174

COUNTY OF FRANKLIN

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Subscribed and sworn to before me, a Notary Public in and before said County and State, by Heather Whitney, this 12 day of November 2020.



Paul D. Flory
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.



Notary Public

Notary ID Number: NA

My Commission Expires: Never

VERIFICATION

The undersigned, Kamran Ali, being duly sworn, deposes and says he is a Managing Director of Transmission Planning for American Electric Power Service Corporation 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.

Kamran Ali

Kamran Ali

STATE OF OHIO

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) Case No. 2020-00174

COUNTY OF FRANKLIN

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Subscribed and sworn to before me, a Notary Public in and before said County and State, by Kamran Ali, this 12th day of November 2020.



Paul D. Flory
Attorney At Law
Notary Public, State of Ohio
Commission has no expiration date
Sec. 147.09 R.C.

Paul D. Flory

Notary Public

Notary ID Number: NA

My Commission Expires: Never