

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

DATA REQUEST

Walmart_1_004 Please provide copies of all rate design workpapers in electronic format 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.

August 27, 2020 Supplemental Response

See also the Company's response to KPSC 2-16.

Witness: Brian K. West

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

DATA REQUEST

Walmart_1_005 Please provide copies of any cost of service studies in electronic format 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.

August 27, 2020 Supplemental Response

See also the Company's response to KPSC 2-16.

Witness: Brian K. West

VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and states he is the Director of Regulatory Services for Kentucky Power Company that he has personal knowledge of the matters set forth in the foregoing 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

State of Indiana)
) ss Case No. 2020-00174
County of Allen)

Subscribed and sworn to before me, a Notary Public, in and for said County and State, Brian K. West this 27th day of August, 2020.

Regiana M.
Sisteveris

Digitally signed by Regiana M.
Sisteveris
Date: 2020.08.27 09:33:33 -04'00'

Regiana M. Sisteveris, Notary Public

My Commission Expires: January 7, 2023

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