

Kentucky Power Company
KPSC Case No. 2020-00174
Commission Staff's Sixth Set of Data Requests
Dated October 20, 2020

DATA REQUEST

KPSC_6_017 Refer to Kentucky Power's response to Staff's Fourth Request, Item 117. Provide the percentage of rebuilt, reconductored, and replacement poles installed since December 31, 2017, as compared to Kentucky Power's total number of poles.

RESPONSE

The percentage of total poles the Company has replaced since December 31, 2017 is 3.3%. The Company does not track the number poles its rebuilds or reconductors and is therefore unable to provide the requested percentages of rebuilt or reconductored poles.

November 5, 2020 Amended Response

The percentage of total poles the Company has replaced since December 31, 2017 is 3.8%. The Company does not track the number poles its rebuilds or reconductors and is therefore unable to provide the requested percentages of rebuilt or reconductored poles.

Witness: Everett G. Phillips

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DATA REQUEST

KPSC_6_024 Refer to Kentucky Power's response to Staff's Fifth Request, Item 2h and 2j(2)–(3).

- a. Explain whether Kentucky Power is always informed when Kentucky Transco is performing work on the Transmission system.
- b. Explain whether any Kentucky Power personnel perform work that is billed to Kentucky Transco. If so, provide that annual amounts billed to Kentucky Transco since the inception of Kentucky Transco.
- c. Explain whether the transmission projects that Kentucky Transco has performed in Kentucky Power's service territory would have been performed by Kentucky Power if Kentucky Transco had not been formed.
- d. Explain whether the annual transmission revenue requirement that is on Kentucky Transco's books would be on Kentucky Power's books if Kentucky Transco had not been formed, and if not, explain why not.

RESPONSE

a. Yes, AEP Transmission performs work on the transmission system on behalf of both Kentucky Power and Kentucky Transco. To this end, AEP Transmission meets and communicates regularly with Kentucky Power personnel to discuss transmission work that will be performed in Kentucky Power's service territory. Such communications include regular meetings with Kentucky Power management and the coordination of operational activities as transmission work is executed.

b. Kentucky Power does not maintain its records in the manner requested. The Company had not performed the requested analysis prior to this request, but it is in the process of doing so now. The Company will supplement this response with the requested information as soon as practicable, and by no later than November 6, 2020.

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c. Kentucky Power cannot confirm whether the Company would have, as of the date of this response, undertaken all of the capital projects that Kentucky Transco has performed since its formation. Although the underlying needs for the projects would still have existed, and would be addressed at some point by Kentucky Power, the timing of the execution of the projects may have been impacted depending on the capital constraints experienced by Kentucky Power in Kentucky Transco's absence.

d. See the response to subpart (c).

November 5, 2020 Supplemental Response

b. Please see below for the labor and labor-related amounts billed by Kentucky Power personnel to Kentucky Transco since 2010. These amounts relate primarily to the installation and maintenance of electronic equipment associated with transmission system upgrades.

2010: \$15,779
2011: \$19,794
2012: \$5,075
2013: \$11,241
2014: \$21,062
2015: \$106,468
2016: \$49,370
2017: \$57,727
2018: \$139,569
2019: \$344,301
2020 through September 30: \$79,234

Witness: Kelly D. Pearce

Witness: Kamran Ali

Witness: Alex E. Vaughan



Pearce_KY Discovery Verification.docx

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E-Signature Summary

E-Signature 1: Kelly D. Pearce (KDP)

October 30, 2020 07:41:28 -8:00 [9B115441865F] [24.208.135.157]
kdpearce@aep.com (Principal) (Personally Known)

E-Signature Notary: Sarah Smithhisler (SRS)

October 30, 2020 07:41:28 -8:00 [17E132915D8D] [161.235.2.87]
srsmithhisler@aep.com

I, Sarah Smithhisler, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Kelly D. Pearce, being duly sworn, deposes and says he is a Managing Director of Transmission Asset Strategy and Policy 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.

Kelly D. Pearce
Signed on 2020/10/30 07:41:28 -8:00

Kelly D. Pearce

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 Kelly D. Pearce, this this 30th day of October 2020.



S. Smithhisler
Signed on 2020/10/30 07:41:28 -8:00

Notary Public

Notary ID Number: 2019-RE-775042

384D47F5-7D9A-4A8C-9056-8B4E81E179ED --- 2020/10/30 05:55:17 -8:00 --- Remote Notary



VERIFICATION

The undersigned, Everett G. Phillips, being duly sworn, deposes and says he is Vice President of Distribution Region Operations 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.


Everett G. Phillips

COMMONWEALTH OF KENTUCKY

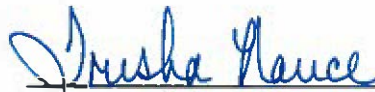
)

) 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
Everett G. Phillips, this 5th day of November 2020.



Notary Public

Notary ID Number: 632421

My Commission Expires: 09-26-2023

