

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
POWER COMPANY FOR (1) A GENERAL)
ADJUSTMENT OF ITS RATES FOR ELECTRIC)
SERVICE; (2) APPROVAL OF TARIFFS AND)
RIDERS; (3) APPROVAL OF ACCOUNTING) Case No. 2020-00174
PRACTICES TO ESTABLISH REGULATORY)
ASSETS AND LIABILITIES; (4) APPROVAL OF)
A CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY; AND (5) ALL OTHER)
REQUIRED APPROVALS AND RELIEF)

ATTORNEY GENERAL AND KIUC's MOTION FOR PARTIAL DEVIATION

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and KIUC, and respectfully requests a partial deviation from the filing requirements of 807 KAR 5:001 §§ 8(3) and (12)(a), which require a paper copy of electronically filed documents to be filed with the Commission, and from the Commission's Procedural Orders dated July 14 2020, requiring original documents to be filed within 30 days of the lifting of the current state of emergency.

On November 2, 2020, the Attorney General electronically filed his responses to Data Requests from PSC Staff, KYSEIA, and Kentucky Power Company. Many of the documents for which the Attorney General seeks this partial deviation are in their native Excel spreadsheet format. As such, if they were to be printed, the spreadsheets would be rendered nearly unidentifiable and not readily usable. Further, many voluminous PDFs were filed as responses and attachments to the data requests. Some of those have been printed by the Attorney General's Office and will be filed. However, other PDFs, as described at Appendix A were quite large, and the Attorney General requests deviation from the filing requirements

for those PDFs in order to alleviate the burden associated with the production and filing of those documents and promote efficient use of resources for OAG and PSC Staff.

The Attorney General intends to file the original of his actual response to these data requests in the docket, with the exception of the PDFs and excel spreadsheets identified in Appendix A. Producing the hard copies of these documents would require producing at least 1768 pages of PDFs, the volume of pages associated with the production 28 excel files, many of which have multiple tabs, and an undetermined number of binders and bankers boxes within which to transport them. The Attorney General simply does not have the resources necessary to accomplish such an undertaking.

All of the documents for which the Attorney General requests such deviation are currently uploaded and fully accessible on the Commission's website for the Commission and the parties to review, and as such form a part of the official record in this case. The titles of the specific documents for which the Attorney General seeks such deviation are listed in the attached "APPENDIX A" to this filing. The Attorney General will provide the PDFs and excel files on a CD as an attachment to the hard copy of this motion once the emergency has been lifted.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion for partial deviation.

Respectfully submitted,

DANIEL J. CAMERON
ATTORNEY GENERAL

A handwritten signature in blue ink that reads "J. Michael West". The signature is fluid and cursive, with a horizontal line extending from the end of the name.

J. MICHAEL WEST
LAWRENCE W. COOK
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
700 CAPITAL AVE, SUITE 20
FRANKFORT, KY 40601-8204
PHONE: (502) 696-5433
FAX: (502) 573-1005
Michael.West@ky.gov
Larry.Cook@ky.gov
John.Horne@ky.gov

/s/ Michael L. Kurtz
Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513.421.2255 fax: 513.421.2764
mkurtz@bkllawfirm.com
kboehm@BKLLawfirm.com
jkylercohn@BKLLawfirm.com

Certificate of Service and Filing

Pursuant to the Commission's Order dated March 17, 2020 in Case No. 2020-00085, and in accord with all other applicable law, Counsel certifies that an electronic copy of the forgoing was served and filed by e-mail to the following. A physical copy of the filing will be submitted to the Commission once the State of Emergency has ceased.

Mark R. Overstreet
Katie M. Glass
moverstreet@stites.com
kglass@stites.com

Joe Childers
joe@jchilderslaw.com

Don Parker
Carrie Grundmann
Barry Naum
dparker@spilmanlaw.com
cgrundmann@spilmanlaw.com
bnaum@spilmanlaw.com

Randal A. Strobo
Clay A. Barkley
David E. Spenard
rstrobo@strobobarkley.com
cbarkley@strobobarkley.com
dspenard@strobobarkley.com

Tom Fitzgerald
fitzKRC@aol.com

Michael A. Frye
maf@jenkinsfenstermaker.com

Matthew Miller
matthew.miller@sierraclub.org

this 11th day of November, 2020



Assistant Attorney General

APPENDIX A

1. Documents related to AOG and KIUCs Responses to Staff DRs filed 11/2/2020 (1 and 2 of 2)

201102_Final_Staff_DR_Response.pdf
OAG and KIUCs Responses to Staff DRs

20201102_Read1st.pdf
Read1st

PSC_12_Binder_1.pdf
Staff 12 PDF 1

PSC_12_Binder_2.pdf
Staff 12 PDF 2

PSC_12_Binder_3.pdf
Staff 12 PDF 3

Staff_1_AEP_OATT_PTRRs.xlsx
Staff 1 Excel

Staff_1_Figure_1_Table_3_-_Final.xlsx
Staff 1 Excel

Staff_1_KPCO_R_KIUC_AG_2_30_Attachment1-SJB.xlsx
Staff 1 Excel

Staff_6_Kentucky_Power_Oct_2020_ROE.xlsx
Staff 6 Excel

PSC_12_Binder_4.pdf
PSC PDF 4

2. Documents related to OAG and KIUC's Response to Kentucky Power DRs filed 11/2/2020 (1,2,and 3)

KPC_1_AEP_OATT_PTRRs.xlsx
KPC 1

KPC_1_Copy_of_KPCO_R_KPSC_3_1_Attachment17_VaughanWP3.xlsx
KPC 1

KPC_1_Copy_of_KPCO_R_KYSEIA_1_3_Attachment1.xlsx
KPC 1

KPC_1_Figure_1_Table_3_-_Final.xlsx
KPC 1

KPC_1_KPCO_R_KIUC_AG_2_30_Attachment1-SJB.xlsx
KPC 1

KPC_1_Table_1._CCOS_KPCO_R_KPSC_2_16_Attachment3.xlsx
KPC 1

KPC_1_Table_2,_KPCO_R_KIUC_AG_1_45_Attachment_1.xls
KPC 1

KPC_7_2020_Q2_Credit_Ratings.xlsx
KPC 7

KPC_7_2020_Q2_Rate_Review.xlsx
KPC 7

KPC_7_2020_Treasury_Yields.xlsx
KPC 7

KPC_7_COC_-_Reduction_of_ROE_from_10%_to_9.0%_Only.xlsx
KPC 7

KPC_15_KPCO_R_KPSC_3_1_Attachment33_ScottWP2_-_As_Filed.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_3_1_Attachment33_ScottWP2_-_Change_ML-
FGD_to_8.12%_ROR.xlsx
KPC 15

KPC_7_Historical_Treasury_Bond_Yields_from_2007.xlsx
KPC 7

KPC_7_Value_Line_Investment_Analyzer_Summary_Sept_18_2020.xlsx
KPC 7

KPC_7_VIX_through_Sept_25_2020.xlsx
KPC 7

KPC_15_KPCO_R_KPSC_3_1_Attachment33_ScottWP2_-_Change_ML-

FGD_to_8.12%_ROR-Change_GRCF_State_5%.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_3_1_Attachment33_ScottWP2_-_Change_ML-
Non_FGD_to_7.88%_grossed_Up_ROR.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_3_1_Attachment33_ScottWP2_-_
_Combined_4_COC_Adjustments.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_4_018_Attachment2_-_As_Filed-Decom_Rider.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_4_018_Attachment2_-_
_Restate_to_Reflect_5%_KY_Only_State_Tax_Rate.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_4_018_Attachment2_-_
_Restate_to_Reflect_All_COC_Changes_Recommended_by_AG-KIUC.xlsx
KPC 15

KPC_15_KPCO_R_KPSC_4_018_Attachment2_-_
_Updated_to_8.12_Grossed_Up_COC_Ask.xlsx
KPC 15

3. Attachments to OAG and KIUCs Supplemental Response to Company Data Request filed
11/5/2020

Kentucky_Power_Oct_2020_ROE.xlsx
Attachment