

**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 Practices To Establish) Case No. 2020-00174
Regulatory Assets And Liabilities; (4) Approval Of A)
Certificate Of Public Convenience And Necessity;)
And (5) All Other Required Approvals And Relief)

**Kentucky Power Company’s Data Requests to the Attorney General of the
Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc.**

Pursuant to the Commission’s Order dated July 14, 2020, Kentucky Power Company propounds the following data requests to be answered by the Attorney General of the Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc. (“KIUC”):

DEFINITIONS

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
- “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
- A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Attorney General’s possession or subject to its control, state what disposition was made of it.
- A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
- “Identify” used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
- Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
- “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
- “Attorney General” means the Attorney General of the Commonwealth of Kentucky, the Attorney General’s Office of Rate Intervention, its employees, and/or its agents, including Stephen J. Baron, Richard A. Baudino, and Lane Kollen.
- “KIUC” means Kentucky Industrial Utility Customers, Inc., its employees, and/or its agents, including Stephen J. Baron, Richard A. Baudino, and Lane Kollen.
- “PJM” means PJM Interconnection.
- “Company” means Kentucky Power Company.
- “AEP” means American Electric Power Company, Inc.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and, without regard to the date created or obtained, information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power. Any studies, evaluations, analyses, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

DATA REQUESTS

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Stephen J. Baron in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baron. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please identify and provide all workpapers, data, and other documents or information used to prepare Figure 1 on page 16 of Mr. Baron's testimony.
4. Please explain the basis for, and identify and provide all workpapers, data, and other documents or information supporting, the statement on page 17 of Mr. Baron's testimony that "[i]n 2020, the difference in total revenue requirements between KPCo's actual costs . . . and the amount allocated to KPCo under the Transmission Agreement is about \$19 million."
5. Please identify and provide all workpapers, data, and other documents or information used to prepare Table 3 on page 18 of Mr. Baron's testimony.
6. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Richard A. Baudino in electronic format, with formulas intact and visible, and no pasted values.
7. Please provide all workpapers, forecasts, reports, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baudino. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
8. Please provide the September 11, 2020 Value Line Investment Survey report referenced on page 13, line 10 of Mr. Baudino's testimony.
9. Please provide the EEI credit ratings assessment referenced on page 14, line 12 of Mr. Baudino's testimony.
10. Please provide the September 3, 2020 Fitch Ratings announcement referenced on page 14, line 27 of Mr. Baudino's testimony.
11. Has Mr. Baudino conducted a DCF analysis for Kentucky Power Company that includes all of the companies included in Company witness McKenzie's proxy group? If so, please provide the results of that analysis.
12. Has Mr. Baudino conducted a CAPM analysis for Kentucky Power Company that includes all of the companies included in Company witness McKenzie's proxy group? If so, please provide the results of that analysis.

13. Please provide Duff and Phelps' 2020 Valuation Handbook referenced on page 30, line 23 of Mr. Baudino's testimony.
14. Please provide a complete copy of the September 17, 2020 UBS Roadshow that Mr. Baudino attached excerpts of in Exhibit RAB-2.
15. Please provide all schedules, tables, and charts included in the testimony and exhibits to the testimony of Lane Kollen in electronic format, with formulas intact and visible, and no pasted values.
16. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Kollen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
17. Refer to page 9 of Mr. Kollen's testimony. Confirm that Duke Energy Kentucky, Inc. submitted applications based upon forecasted test periods in Case Nos. 2018-00261 and 2019-00271. If your response is anything other than an unqualified confirmation please provide all evidence supporting the response.
18. Refer to page 15 of Mr. Kollen's testimony. Confirm that Atmos Energy Corporation submitted an application based upon a forecasted test period in Case No. 2017-00349. If your response is anything other than an unqualified confirmation please provide all evidence supporting the response.
19. Please explain the basis for, and identify and provide all workpapers, data, and other documents or information supporting, the \$19 million referenced on page 54, line 5 of Mr. Kollen's testimony.
20. Please explain the basis for, and identify and provide all workpapers, data, and other documents or information supporting, the \$465 million referenced on page 54, lines 7-8 of Mr. Kollen's testimony.
21. Please explain the basis for, and identify and provide all workpapers, data, and other documents or information supporting, the \$1,408 million referenced on page 54, line 10 of Mr. Kollen's testimony.

Respectfully submitted,



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