

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_001** Refer to the Application, Section V, Exhibit 1, Workpaper S-2, page 2 of 3. Provide the workpapers and any underlying assumptions for the Apportionment Factors used to calculate the State Income Effective Tax Rate on this schedule.

**RESPONSE**

Please see KPCO\_R\_KPSC\_PH\_1\_Attachment1 for the Apportionment Factors workpaper that calculates the State Income Effective Tax Rate on schedule Section V, Exhibit 1, WorkpaperS-2.

Witness: Allyson L. Keaton

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 1 of 5

**DATA REQUEST**

- KPSC\_PH\_002** Refer to Kentucky Power's response to the Attorney General/KIUC's Second Request for Information, Item 44(a), Attachment 1; Rebuttal Testimony of Brian K. West at R11; and to the November 19, 2020 hearing testimony of Brian K. West regarding dues paid to Edison Electric Institute (EEI) by Kentucky Power.
- a. Confirm the \$16,455 of dues related to lobbying are below the line expenses not included in the cost of service. If this cannot be confirmed, state specifically the document or documents in Kentucky Power's Application that evidence the adjustment to remove EEI dues paid by Kentucky Power.
  - b. Provide the calculation for the 3.88 percent allocation to Kentucky Power.
  - c. Explain the basis for Kentucky Power's 3.9 percent allocation for legislative activities and reconcile this percentage with the percentages for "influencing legislation" listed on the EEI bill to AEP.
  - d. State the benefits to Kentucky Power's ratepayers of participation in EEI.

**RESPONSE**

- a. Please refer to KPCO\_R\_KPSC\_PH\_2\_Attachment1, "Summary" Tab, for a comprehensive tie out of AEP 2020 EEI Membership Dues Invoice amounts allocated to and recorded by Kentucky Power Company. As described at Line 11 of KPCO\_R\_KPSC\_PH\_2\_Attachment1, "Summary" Tab, Kentucky Power confirms that the recalculated amounts of \$14,505.94 related to influencing legislation recorded in FERC account 426.4 and \$1,939.46 related to donations recorded in FERC account 426.1 were excluded from the cost of service (total of \$16,445.40 excluded from the cost of service).
- b. Please refer to KPCO\_R\_KPSC\_PH\_2\_Attachment1, "EEI Invoice Allocation" Tab, for calculation of the 3.88% allocation to Kentucky Power.
- c. As shown in KPCO\_R\_KPSC\_PH\_2\_Attachment1, "Summary" Tab Lines 1 through 4, the basis for allocation of each 2020 EEI Membership Dues Invoice line item to Kentucky Power is 3.88% (which rounds to the referenced 3.9% allocation), as substantiated by the Company's response to subpart b. above. The basis for recording Kentucky Power allocated amounts to the appropriate FERC account (which drives appropriate treatment in the cost of service) is the information included in the EEI

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 2 of 5

invoice, as computed in KPCO\_R\_KPSC\_PH\_2\_Attachment1, "Summary" Tab Lines 1 through 4 and described in more detail in Lines 8 - 11.

d. EEI provides public policy leadership, strategic business intelligence, conferences and forums, and a range of services to its members. These costs are prudently incurred in providing utility service and convey benefits to customers. Some additional examples include the following:

- EEI provides relevant research, analysis and expertise on a range of industry issues.
- EEI offers meetings and conferences each year, providing information and data exchange.
- EEI also collects and provides a wide range of industry data.

EEI coordinates with organizations like NASUCA and NARUC to discuss important policy issues and develop positions that benefit customers. Included below are more details of the benefits that EEI participation provides.

As is known the Edison Electric Institute (EEI) is the association that represents all U.S. investor-owned electric companies and their customers. Members of EEI provide electricity for more than 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. Kentucky utilities including Kentucky Power, Duke Energy- Kentucky, and Louisville Gas & Electric and Kentucky Utilities are all EEI members.

EEI's founding constitution pledged to aid members to "generate and sell electric energy at the lowest possible price commensurate with safe and adequate service." For more than 85 years, EEI members have made good on that vision. Each day, EEI member companies create value for all stakeholders, while delivering the safe, reliable, affordable, secure, and clean energy their customers need and expect.

EEI provides member companies with a range of services, beyond the lobbying activity that are reported consistent with federal requirements, that benefit electricity customers.

Grid Resilience, Power Restoration

There is perhaps no stronger customer benefit than the work EEI does with its members on storm response and recovery. EEI and member companies have devoted significant time and resources to strengthen the reliability and resiliency of the energy grid, which directly benefits customers.

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 3 of 5

During weather events, EEI provides a coordinating function between members and between members and the federal and state governments. EEI also provides strategic communication support aimed at ensuring that customers have the most up-to-date information on safety and restoration.

The work EEI does with its members through the mutual assistance process has evolved to meet the needs of increasingly strong and frequent storms, an increasingly-connected society that runs on reliable power, and new technologies that help restore power more quickly.

These efforts paid off during recent storms. By applying the lessons we learned from Superstorm Sandy and the tools developed by EEI—including the government-industry partnership and cross-sector coordination embodied in the Electricity Subsector Coordinating Council—EEI and its member companies have further streamlined response and restoration efforts. As one example, there was widespread recognition that EEI members' investments in the energy grid, their streamlined and enhanced storm response, and their enhanced coordination resulted in a much faster, successful restoration effort for 3.1 million customers impacted by Hurricane Matthew. That same commitment to safe, efficient power restoration was on display during historic storms like Hurricane Irma.

#### Grid Security

EEI was instrumental in the creation and growth of the Electricity Subsector Coordinating Council (ESCC) and remains active in its leadership and staffing. The ESCC serves as the principal liaison between the federal government and the electric power industry, with the mission of coordinating efforts to prepare for, and respond to, national-level disasters or threats to critical infrastructure. The ESCC includes electric company CEOs and trade association leaders representing all segments of the industry. Its counterparts include senior Administration officials from the White House, relevant Cabinet agencies, federal law enforcement, and national security organizations.

EEI is also leading the industry in efforts to partner with the federal government to address new cybersecurity threats. As cybersecurity risks proliferate, EEI's member companies are organizing themselves to pool resources in the face of cyber incidents or attacks that exceed the capacity of individual member companies to respond. Building on the successful mutual assistance model, EEI through the ESCC has also launched a Cyber Mutual Assistance Program to provide emergency cyber assistance within the electric power and natural gas industries. Currently more than 160 entities, representing electric and natural gas investor-owned companies, public power utilities, electric cooperatives, Regional Transmission Organizations and Independent System Operators, and Canadian energy companies, participate in the CMA Program. These entities cover more than 80

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 4 of 5

percent of U.S. electricity and natural gas customers, and more than 1.25 million electricity customers in Canada.

Workforce Development

EEI's pre-employment test batteries (covering many industry positions such as plant operations and maintenance, transmission and distribution, and technician jobs) assist members to obtain the most qualified, productive employees.

EEI has partnered with other associations, education institutions, and organized labor to continue to attract and retain quality talent. In 2006, EEI was part of a founding group to launch the Center for Energy Workforce Development (CEWD) to address the energy industry's evolving workforce needs. In 2011, EEI and CEWD launched the Troops to Energy Jobs program. In 2008, EEI and the International Brotherhood of Electrical Workers teamed up to create the National Labor and Management Public Affairs Committee to bring together labor and management to discuss areas of shared concern.

ESG Template

To better serve customers, EEI launched an environmental, social, governance, and sustainability-related reporting template, with the goal of helping EEI's member electric companies provide interested parties with more uniform and consistent ESG/sustainability data and information. EEI coordinated members and the investment community to ensure the provision of reliable, consistent metrics on relevant environment and other issues. This template has been hailed as a model for other sectors to follow.

Meetings

EEI offers dozens of meetings and conferences each year, providing information, data exchange, and an opportunity for policy discussions aimed at ensuring the continued provision of affordable, reliable, and increasingly clean electricity in a rapidly changing world. Meetings are planned and staffed by EEI employees. Meeting topics include: Accounting; Business Diversity; National Key Accounts; Occupational Safety and Health, and; Transmission, Distribution, Metering & Mutual Assistance.

A key benefit for electric companies' customers is the sharing of best practices and knowledge transfer. EEI generates this benefit through engaging member companies at every level, from CEOs to technical staff, through committees. Through this system, member company employees convene with their peers to set policy direction as well as share information. EEI has dozens of committees, ranging from communications, customer solutions, regulatory, energy delivery, energy supply, engineering, environment, finance, government relations, legal, security, and technology. Over the

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 5 of 5

years, committees have been supplemented with online workrooms and webinars to further disseminate best practices to member company staff.

EEI is regarded as the gold standard for many reports and has the capability to collect industry data through its relationship with the electric sector. One example report is the Typical Bills and Average Rates Report, which allows the member utility to compare the price of electricity by customer type, state, region, company, year, fuel clause adjustment, state average of listed companies or state average of all companies. This information can be used in regulatory filings to inform Commissions of data and trends across the utilities in their respective state.

Witness: Brian K. West

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 1 of 2

**DATA REQUEST**

- KPSC\_PH\_003** Refer to the response to Commission Staff's Fourth Request for Information, Item 106.
- a. Provide the amount of 401(k) matched contributions by Kentucky Power during the test period.
  - b. Provide the amount of Kentucky Power's defined benefit pension expense for the test period.
  - c. Provide the amount of 401(k) matched contributions Kentucky Power provided during the test period for employees that participate in a defined benefit pension plan.

**RESPONSE**

- a. Please refer to KPCO\_R\_KPSC\_PH\_3\_Attachment1 for the requested information
- b. Please refer to KPCO\_R\_KPSC\_PH\_3\_Attachment2 for Kentucky Power Company's cash balance formula pension expense during the test year.
- c. The Commission recognized the Company's cash balance pension benefit was based on a 'defined contribution' formula, rather than a traditional final average pay formula, in its January 18, 2018 order in Case No. 2017-00179 <sup>1</sup>. The cash balance formula provides a contribution of 3% to 8.5% (depending on age and years of service) of each participant's eligible earnings to an individual cash balance pension account that grows with interest. In this order, the Commission also recognized that participation in the Company's traditional final average pay pension formula was frozen in 2000 and that benefits from this formula were frozen in 2010. The Company meets both its cash balance and frozen final average pay pension obligations with contributions to a pension trust. The Company, not the participant, bears the investment and other risks associated with the trust and its pension obligations and both pension formulas are considered to be a defined benefits under ERISA.

The Company's 401k and cash balance formula pension contributions were designed together to provide reasonable and market competitive benefits in total. Each of these contributions is less than would be needed to provide market competitive retirement benefits to participants using a single stand-alone benefit formula. This is presumably a large part of the reason the Commission allowed the Company to recover the cost of both types of plans in the Company's previous rate case. In accordance with this 'swirl cone' design, all employees who participate in the 401(k) plan also participate in the cash balance pension formula and the entire amount of 401(k) matching contributions shown

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 2 of 2

in a. above was provided for employees who also participated in the cash balance pension formula.

<sup>1</sup> Order, Case No. 2017-00179, at 15 (Jan. 18, 2018).

Witness: Heather M. Whitney

Witness: Andrew R. Carlin



Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_004** Provide a copy of the revised Tariff Sheet 2-6, 7. Underground Service that conforms to the revisions set forth in Kentucky Power's response to Commission's Staff's Fourth Request for Information, Items 5-6; Kentucky Power's response to Commission Staff's Fifth Request for Information, Item 4; and to the hearing testimony of Scott Bishop.

**RESPONSE**

Please see KPCO\_R\_KPSC\_PH\_4\_Attachment1 for requested information. The Company filed updated tariff sheet 2-6 reflecting the revisions on October 8, 2020.

Witness: Scott E. Bishop

KENTUCKY POWER COMPANY

P.S.C. KY. NO. ~~11-12~~ ORIGINAL SHEET NO. 2-6 T  
CANCELLING P.S.C. KY. NO. ~~11 ORIGINAL 10~~ SHEET NO. 2-6 T

**TERMS AND CONDITIONS OF SERVICE (Cont'd)**

**7. UNDERGROUND SERVICE**

When a real estate developer desires an underground distribution system within the property which ~~they are he is~~ developing or when a Customer, city, or town within Kentucky Power's service territory desires an underground service, the real estate developer, ~~or the~~ Customer, city, or town, as the case may be, shall pay the Company the difference between the anticipated cost of the underground facilities so requested and the cost of the overhead facilities which would ordinarily be installed in accordance with 807 KAR 5:041, Section 21, and the Company's underground service plan as filed with the Public Service Commission. If the entity requesting underground service is a city or town, such costs will be paid exclusively by the residents of the city or town. Upon receipt of payment, the Company will install the underground facilities and will own, operate and maintain the same.

When the Company is required to install underground facilities or relocate existing overhead facilities underground pursuant to a municipal or other governmental requirement or directive, the difference between the cost of the underground facilities installed and the cost of the overhead facilities that would ordinarily be installed, or in the case of the relocation of existing overhead facilities, the entire cost of the relocation underground, shall be recovered from city or town. The relocation or installation costs shall be paid by the city or town prior to the Company beginning the relocation or installation. When necessary, at the request of a city or town, the Company will negotiate a payment arrangement with the city or town that provides for an initial partial payment by the city or town and for customers within the boundary of the city or town to pay remaining amounts owed over time.

**8. COMPANY'S LIABILITY**

The Company will use reasonable diligence in furnishing a regular and uninterrupted supply of energy, but does not guarantee uninterrupted service. The Company shall not be liable for damages in case such supply should be interrupted or fail by reason of an event of Force Majeure. Force Majeure consists of an event or circumstance which prevents Company from providing service, which event or circumstance was not anticipated, which is not in the reasonable control of, or the result of negligence of, the Company, and which, by the exercise of due diligence, Company is unable to overcome or avoid or cause to be avoided. Force Majeure events includes act of God, the public enemy, accidents, labor disputes, orders or acts of civil or military authority, breakdowns or injury to the machinery, transmission lines, distribution lines or other facilities of the Company, or extraordinary repairs.

Unless otherwise provided in a contract between the Company and Customer, the point at which service is delivered by Company to Customer, to be known as "delivery point," shall be the point at which the Customer's facilities are connected to the Company's facilities. The metering device is the property of the Company. The meter base, connection, grounds and all associated internal parts inside the meter base are customer owned and are the responsibility of the customer to install and maintain. The Company shall not be liable for any loss, injury, or damage resulting from the Customer's use of their equipment or occasioned by the energy furnished by the Company beyond the delivery point.

Any new installation, upgrade or other modification of an existing meter installation shall be made using only Company-supplied or Company-approved meter bases. A list of Company-approved meter bases and specifications can be found on the Company's website at: [www.kentuckypower.com](http://www.kentuckypower.com).

The Customer shall provide and maintain suitable protective devices on their equipment to prevent any loss, injury or damage that might result from single phasing conditions or any other fluctuation or irregularity in the supply of energy. The Company shall not be liable for any loss, injury or damage resulting from a single phasing condition or any other fluctuation or irregularity in the supply of energy which could have been prevented by the use of such protective devices. The Company shall not be liable for any damages, whether direct, incidental or consequential, including, without limitation, loss of profits, loss of revenue, or loss of production capacity occasioned by interruptions, fluctuations, or irregularity in the supply of energy.

The Company is not responsible for loss or damage caused by the disconnection or reconnection of its facilities. The Company is not responsible for loss or damages caused by the theft or destruction of Company facilities by a third party.

The Company will provide and maintain the necessary line or service connections, transformers (when same are required by conditions of contract between the parties thereto), meters and other apparatus, which may be required for the proper measurement of and protection to its service. All such apparatus shall be and remain the property of the Company.

(Cont'd on Sheet 2-7)

DATE OF ISSUE: June 29, 2020  
DATE EFFECTIVE: Service Rendered On And After December 30, 2020  
ISSUED BY: /s/ Brian K. West  
TITLE: Director, Regulatory Services  
By Authority Of an Order of the Public Service Commission  
In Case No. 2020-00174 Dated XXXXXX

KENTUCKY POWER COMPANY

P.S.C. KY. NO. 12 ORIGINAL SHEET NO. 2-6 T  
CANCELLING P.S.C. KY. NO. 11 ORIGINAL SHEET NO. 2-6 T

**TERMS AND CONDITIONS OF SERVICE (Cont'd)**

**7. UNDERGROUND SERVICE**

When a real estate developer desires an underground distribution system within the property which they are developing or when a Customer, city, or town within Kentucky Power's service territory desires an underground service, the real estate developer, Customer, city, or town, as the case may be, shall pay the Company the difference between the anticipated cost of the underground facilities so requested and the cost of the overhead facilities which would ordinarily be installed in accordance with 807 KAR 5:041, Section 21, and the Company's underground service plan as filed with the Public Service Commission. If the entity requesting underground service is a city or town, such costs will be paid exclusively by the residents of the city or town. Upon receipt of payment, the Company will install the underground facilities and will own, operate and maintain the same. T

When the Company is required to install underground facilities or relocate existing overhead facilities underground pursuant to a municipal or other governmental requirement or directive, the difference between the cost of the underground facilities installed and the cost of the overhead facilities that would ordinarily be installed, or in the case of the relocation of existing overhead facilities, the entire cost of the relocation underground, shall be recovered from city or town. The relocation or installation costs shall be paid by the city or town prior to the Company beginning the relocation or installation. When necessary, at the request of a city or town, the Company will negotiate a payment arrangement with the city or town that provides for an initial partial payment by the city or town and for customers within the boundary of the city or town to pay remaining amounts owed over time. T

**8. COMPANY'S LIABILITY**

The Company will use reasonable diligence in furnishing a regular and uninterrupted supply of energy, but does not guarantee uninterrupted service. The Company shall not be liable for damages in case such supply should be interrupted or fail by reason of an event of Force Majeure. Force Majeure consists of an event or circumstance which prevents Company from providing service, which event or circumstance was not anticipated, which is not in the reasonable control of, or the result of negligence of, the Company, and which, by the exercise of due diligence, Company is unable to overcome or avoid or cause to be avoided. Force Majeure events includes act of God, the public enemy, accidents, labor disputes, orders or acts of civil or military authority, breakdowns or injury to the machinery, transmission lines, distribution lines or other facilities of the Company, or extraordinary repairs. T

Unless otherwise provided in a contract between the Company and Customer, the point at which service is delivered by Company to Customer, to be known as "delivery point," shall be the point at which the Customer's facilities are connected to the Company's facilities. The metering device is the property of the Company. The meter base, connection, grounds and all associated internal parts inside the meter base are customer owned and are the responsibility of the customer to install and maintain. The Company shall not be liable for any loss, injury, or damage resulting from the Customer's use of their equipment or occasioned by the energy furnished by the Company beyond the delivery point.

Any new installation, upgrade or other modification of an existing meter installation shall be made using only Company-supplied or Company-approved meter bases. A list of Company-approved meter bases and specifications can be found on the Company's website at: [www.kentuckypower.com](http://www.kentuckypower.com). T

The Customer shall provide and maintain suitable protective devices on their equipment to prevent any loss, injury or damage that might result from single phasing conditions or any other fluctuation or irregularity in the supply of energy. The Company shall not be liable for any loss, injury or damage resulting from a single phasing condition or any other fluctuation or irregularity in the supply of energy which could have been prevented by the use of such protective devices. The Company shall not be liable for any damages, whether direct, incidental or consequential, including, without limitation, loss of profits, loss of revenue, or loss of production capacity occasioned by interruptions, fluctuations, or irregularity in the supply of energy.

The Company is not responsible for loss or damage caused by the disconnection or reconnection of its facilities. The Company is not responsible for loss or damages caused by the theft or destruction of Company facilities by a third party.

The Company will provide and maintain the necessary line or service connections, transformers (when same are required by conditions of contract between the parties thereto), meters and other apparatus, which may be required for the proper measurement of and protection to its service. All such apparatus shall be and remain the property of the Company.

(Cont'd on Sheet 2-7)

DATE OF ISSUE: June 29, 2020  
DATE EFFECTIVE: Service Rendered On And After December 30, 2020  
ISSUED BY: /s/ Brian K. West  
TITLE: Director, Regulatory Services  
By Authority Of an Order of the Public Service Commission  
In Case No. 2020-00174 Dated XXXXX

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 1 of 3

**DATA REQUEST**

- KPSC\_PH\_005** Refer to Kentucky Power's Response to Commission Staff's Sixth Request for Information, Item 9, Attachment 1.
- a. Provide, by customer class, a breakdown of the \$4,066,116.73 total in the delayed payment charge column.
  - b. Provide the number of times the delayed payment charge was billed during the test year, broken down by customer class.
  - c. Provide a narrative explanation for how the energy diversion charge is calculated, including the components that go into the calculation. Provide a breakdown of the \$80,765.89 by each component and provide the number of times the energy diversion charge was billed during the test year.
  - d. Provide the number of times the meter test charge was billed during the test year.
  - e. Provide the number of times reconnect charges were billed during the test year by type of reconnect charge.
  - f. Provide the number of times the returned check charge was billed during the test year.
  - g. Provide a narrative explanation for how the temporary service charge is calculated, including the components that go into the calculation and whether this is a fixed fee. Provide a breakdown of the \$7,446.00 by each component and provide the number of times the temporary service charge was billed during the test year.
  - h. Explain whether Kentucky Power charged any Meter Reading Check Fees in the test year and, if not, whether there is still a need for a Meter Reading Check Fee. If any Meter Reading Check Fees were billed during the test year, provide the number of times the fee was charged during the test year and the amount charged during the test year.
  - i. Confirm whether the on premise collection charge is the same as the termination or field trip charge in Kentucky Power's tariff and provide the number of times the on premise collection charge was billed during the test year.
  - j. Provide a narrative explanation of the relationship between Kentucky Power's delayed payment charge and Kentucky Power's cost of financing account receivables, including the cost support for the proposed delayed payment charge amount.

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 2 of 3

**RESPONSE**

- a. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for requested information.
- b. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for requested information.
- c. When an energy diversion incident is discovered, a Revenue Protection Officer (“RPO”) is notified, and the incident is investigated. The RPO then calculates the charge based on the costs of the investigation. These costs include:
- the labor in hours required to investigate the incident, including labor by the RPO, the Meter Revenue Operations staff, and a line servicer, if necessary;
  - costs associated with vehicle use;
  - the materials required to make the premises safe (including locks, meters, and meter bases depending on any damage sustained); and
  - any fringe and overhead costs associated with the labor, vehicles, or materials used.
- These costs are totaled and added to the customer’s account as an energy diversion charge.
- The Company does not track the costs by components for this charge. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for number of times the energy diversion charge was billed during the test year.
- d. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for requested information.
- e. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for requested information.
- f. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for requested information.
- g. The Temporary Service Charge was established based upon the cost of labor, materials and overheads related to the initiation of service. The charge has been unchanged for a number of years. The Company is evaluating if the charge should be revised.
- The Company does not track the costs by component for this charge. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for the number of times the temporary service charge was billed during the test year.
- h. The Company did not have any Meter Reading Check Fees during the test year. The Company has not examined the continuing need for the charge.
- i. Confirmed. Please see KPCO\_R\_KPSC\_PH\_5\_Attachment1 for requested information.

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 3 of 3

j. Please refer to KPCO\_R\_KPSC\_PH\_5\_Attachment2 for a monthly analysis comparing Kentucky Power's test year accounts receivable factoring expense to the Company's delayed payment charge revenues for the same period.

For the twelve months ended March 31, 2020, Kentucky Power's accounts receivable factoring expense of \$3,800,926.62, consisting of carrying cost and collection experience, constituted 93.478 percent of the Company's delayed payment charge revenue of \$4,066,116.73 for the same period. Stated otherwise, during the test year delayed payment charge revenue reasonably approximated the amount of the Company's related accounts receivable factoring expense. Even if the comparison is limited to the eleven months ended February 29, 2020 to eliminate the effect of the COVID-19 pandemic and the Commission's March 16, 2020 Order in Case No. 2020-00085 suspending the assessment of late payment fees, Kentucky Power's accounts receivable factoring expense equaled 89.409 percent of the Company's delayed payment charge revenue for the same period.

The delayed payment charge is both cost-justified and sends the appropriate behavioral signals to customers.

Test year delayed payment charge revenue of \$4,066,116.73 was included in the calculation of Kentucky Power's revenue requirement. The reduction or elimination of the Company's delayed payment charge would require a commensurate increase in the Company's ongoing rates.

Witness: Scott E. Bishop

Witness: Heather M. Whitney

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 1 of 2

**DATA REQUEST**

- KPSC\_PH\_006** Refer to Sheet No. 2-12 of Kentucky Power's tariff, which contains a charge for work performed on Company's Facilities at Customer's Request.
- a. Explain whether there any charges during the test year for work performed on Company's Facilities at Customer Request.
  - b. Explain the components that go into the calculation and provide the number of times it was charged during the test year.
  - c. If there were any of these charges billed during the test year, provide a breakdown of amounts billed by each component and provide the number of times this charge was billed during the test year.

**RESPONSE**

a. Yes, the Company completed a total of 308 projects on the Company's Facilities at the customer's request during the test year.

b. The components that comprise the charges for work performed on the Company's Facilities at the customer's request are provided below. The number of times each component was charged during the test year is shown in part c.

Fleet – charges for use of vehicles.

Fringes – the allocation of charges associated with labor such as healthcare.

Labor – costs to perform the work.

Materials – the material used to perform the work.

Miscellaneous – unusual expenses charged to the work such as telecommunications.

Overheads – the allocation of charges associated with non-labor.

Tax – Taxes charged on materials for the project.

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020  
Page 2 of 2

c. The breakdown of the test year charges by component is as follows:

<b>Component</b>	<b>Count</b>	<b>Sum</b>
Fleet	185	\$ 31,965.96
Fringes	164	\$ 17,892.26
Labor	897	\$ 1,565,436.51
Materials	1,592	\$ 158,080.52
Miscellaneous	371	\$ 90,621.59
Overheads	1,212	\$ 270,463.62
Tax	1,435	\$ 8,295.28
<b>Grand Total</b>	<b>5,856</b>	<b>\$ 2,142,755.74</b>

Witness: Scott E. Bishop



Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_007** Given that there are Rockport UPA expenses in base rates, provide a detailed list of all base rate expenses that Kentucky Power will no longer incur following the termination of the Rockport UPA in December 2022.

**RESPONSE**

Rockport UPA expenses are billed to the Company and recorded in FERC account 555 purchased power expense. Please see The Company's response to KIUC/AG 1-12, for the detail of FERC account 555 in the Company's cost of service. The Rockport UPA non-fuel costs are recorded in 5550027 and totaled \$57,470,339 in the test year. The Rockport UPA fuel costs are \$25,917,727 during the test year. The amount of non-fuel UPA costs not recovered through the environmental surcharge are recovered through base rates. When the Rockport UPA ends in December of 2022, these costs will no longer be incurred by the Company and the reduction of cost will be reflected through the fuel adjustment clause, the environmental surcharge and the purchase power adjustment tariff as stipulated and approved in Case No. 2017-00174.

Witness: Alex E. Vaughan

Witness: Lerah M. Scott

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_008** Refer to Kentucky Power's response to Attorney General/KIUC's First Request for Information, Item 8. Provide a schedule that separates the test year Rockport UPA expense amounts by recovery mechanism.

**RESPONSE**

Please refer to KPCO\_R\_KPSC\_PH\_8\_Attachment1 for a schedule of test year KY Retail test year Rockport UPA expense broken down by recovery mechanism.

Witness: Alex E. Vaughan

Witness: Lerah M. Scott

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

- KPSC\_PH\_009** Refer to Kentucky Power's response to Commission Staff's Sixth Request for Information, Item 15, Attachment 1.
- a. Explain how plant recovered through Tariff Environmental Surcharge (Tariff ES) was removed from the calculation of total plant in service.
  - b. Provide the total net in service investment, including plant recovered through Tariff ES.

**RESPONSE**

a&b. The Rockport unit 2 SCR CWIP amount was removed from cell D145 on the "AEGBS" tab of KPCO\_R\_KPSC\_6\_15\_Attachment1 to increase the operating ratio back to a normal level for purposes of calculating adjustment W47. The SCR CWIP amount was not subsequently added to the plant in service total in cell H11 on the "AEGBS" tab to avoid including the return on unit 2 SCR plant in adjustment W47.

Please refer to the Company's response to Staff set 3 item 1, KPCO\_R\_KPSC\_\_1\_Attachment33 on the "RP" tab to find the test year amount of environmental plant in service for the both the I&M and AEG portions of Rockport. At the end of the test year, \$172.17 million of AEG Rockport net plant was included in the ES calculation. That represents 45.2% of the plant in service used to calculate adjustment W47 (AEGBS tab, cell H23), and as such the Company's ES tariff monthly basing point should be increased by \$63,804 to account for the impact of adjustment W47 in base rates. This calculation is shown in KPCO\_R\_KPSC\_PH\_9\_Attachment1.

Witness: Alex E. Vaughan

Witness: Lerah M. Scott

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_010** Refer to the Rebuttal Testimony of Adrien M. McKenzie (McKenzie Rebuttal). Provide the source, workpapers and data in Excel spreadsheet format with formulas intact and unprotected, and all cells and rows accessible.

**RESPONSE**

Please see KPCO\_R\_KPSC\_PH\_10\_Attachment1 for the requested information.

Witness: Adrien M. McKenzie

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_011** Refer to the McKenzie Rebuttal, page R5. Provide the source data used in Table R-1.

**RESPONSE**

Please see KPCO\_R\_KPSC\_PH\_11\_Attachment1 for the requested information.

Witness: Adrien M. McKenzie

**Table 3: Electric authorized ROEs: 2007-Q3'20**

Settled versus fully litigated cases									
Year	All cases			Settled cases			Fully litigated cases		
	Average ROE (%)	Median ROE (%)	Number of observations	Average ROE (%)	Median ROE (%)	Number of observations	Average ROE (%)	Median ROE (%)	Number of observations
2007	10.30	10.20	38	10.42	10.33	14	10.23	10.15	24
2008	10.41	10.30	37	10.43	10.25	17	10.39	10.54	20
2009	10.52	10.50	40	10.64	10.62	16	10.45	10.50	24
2010	10.37	10.30	61	10.39	10.30	34	10.35	10.10	27
2011	10.29	10.17	42	10.12	10.07	16	10.39	10.25	26
2012	10.17	10.08	58	10.06	10.00	29	10.28	10.25	29
2013	10.03	9.95	49	10.12	9.98	32	9.85	9.75	17
2014	9.91	9.78	38	9.73	9.75	17	10.05	9.83	21
2015	9.84	9.60	31	10.04	9.60	15	9.66	9.62	16
2016	9.77	9.75	42	9.80	9.85	17	9.74	9.60	25
2017	9.74	9.60	53	9.75	9.60	29	9.73	9.56	24
2018	9.60	9.58	48	9.57	9.63	26	9.63	9.53	22
2019	9.65	9.60	47	9.75	9.73	20	9.58	9.50	27
2020 YTD	9.50	9.44	38	9.52	9.45	15	9.48	9.40	23

General rate cases versus limited-issue riders									
Year	All cases			General rate cases			Limited-issue riders		
	Average ROE (%)	Median ROE (%)	Number of observations	Average ROE (%)	Median ROE (%)	Number of observations	Average ROE (%)	Median ROE (%)	Number of observations
2007	10.30	10.20	38	10.32	10.23	36	9.90	9.90	1
2008	10.41	10.30	37	10.37	10.30	35	11.11	11.11	2
2009	10.52	10.50	40	10.52	10.50	38	10.55	10.55	2
2010	10.37	10.30	61	10.29	10.26	58	11.87	12.30	3
2011	10.29	10.17	42	10.19	10.14	40	12.30	12.30	2
2012	10.17	10.08	58	10.02	10.00	51	11.57	11.40	6
2013	10.03	9.95	49	9.82	9.82	40	11.34	11.40	7
2014	9.91	9.78	38	9.76	9.75	32	10.96	11.00	5
2015	9.84	9.60	31	9.60	9.53	23	10.87	11.00	6
2016	9.77	9.75	42	9.60	9.60	32	10.31	10.55	10
2017	9.74	9.60	53	9.68	9.60	42	10.01	9.95	10
2018	9.60	9.58	48	9.56	9.58	38	9.74	9.70	10
2019	9.65	9.60	47	9.64	9.65	33	9.68	9.31	14
2020 YTD	9.50	9.44	38	9.44	9.45	25	9.62	9.20	13

Vertically integrated cases vs. distribution-only cases									
Year	All cases			Vertically integrated cases			Distribution-only cases		
	Average ROE (%)	Median ROE (%)	Number of observations	Average ROE (%)	Median ROE (%)	Number of observations	Average ROE (%)	Median ROE (%)	Number of observations
2007	10.30	10.20	38	10.50	10.45	26	9.86	9.98	10
2008	10.41	10.30	37	10.48	10.47	26	10.04	10.25	9
2009	10.52	10.50	40	10.66	10.66	28	10.15	10.30	10
2010	10.37	10.30	61	10.42	10.40	41	9.98	10.00	17
2011	10.29	10.17	42	10.33	10.20	28	9.85	10.00	12
2012	10.17	10.08	58	10.10	10.20	39	9.75	9.73	12
2013	10.03	9.95	49	9.95	10.00	31	9.37	9.36	9
2014	9.91	9.78	38	9.94	9.90	19	9.49	9.55	13
2015	9.84	9.60	31	9.75	9.70	17	9.17	9.07	6
2016	9.77	9.75	42	9.77	9.78	20	9.31	9.33	12
2017	9.74	9.60	53	9.80	9.65	28	9.43	9.55	14
2018	9.60	9.58	48	9.68	9.73	23	9.38	9.50	15
2019	9.65	9.60	47	9.73	9.73	25	9.37	9.60	8
2020 YTD	9.50	9.44	38	9.54	9.50	17	9.22	9.40	8

Data compiled Oct. 15, 2020.

Year-to-date through Sept. 30, 2020.

Source: Regulatory Research Associates, a group within S&P Global Market Intelligence

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_012** Refer to the Direct Testimony of Alex E. Vaughan (Vaughan Direct Testimony), page 46, lines 11–12. Also, refer to the Application, Section V, Exhibit 2, W14. Reconcile the discrepancy between the Vaughan Direct Testimony, which states that the weather normalization adjustment increased operation and maintenance expense by \$2,870,414, and W14, which states the weather normalization adjustment increased purchase power expense by \$2,870,414.

**RESPONSE**

No discrepancy exists, purchase power expense is a sub category of operations and maintenance expense. Please also refer KPCO\_R\_KPSC\_3\_1\_Attachment30 for the calculation of the \$2.87 million of variable O&M/purchased power expense included in adjustment W14. Acct 555 was properly adjusted in Section V, Schedule 5 for the purpose of including the expense side of the weather normalization adjustment in the cost of service.

Witness: Alex E. Vaughan

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_013** Provide the supporting calculations for the weather normalization adjustment in Excel spreadsheet format with the formulas intact and unprotected, and cells and rows accessible.

**RESPONSE**

Please refer to the Company's response to KPCO\_R\_KPSC\_2\_16\_Attachment2. Specifically the WNLA tab and then all of the individual tariff tabs that are adjusted for the weather normalization adjustment as indicated on the WNLA tab. On the individual tariff tabs there are columns showing the billing unit and calculated revenue adjustments for each related to the weather normalization adjustment.

Witness: Alex E. Vaughan



Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

- KPSC\_PH\_014** Refer to Kentucky Power's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 47, Attachment 2, which is an Excel spreadsheet of Account 930 Misc. General Expenses that were included in base rates.
- a. State where in the record Kentucky Power provided support that recovery of these expenses is reasonable.

**RESPONSE**

a. Company Witnesses Scott and Bishop analyzed advertising (Scott) and miscellaneous business expenses (Bishop) recorded in Account 930 for reasonableness, to prepare cost of service adjustments W19 and W34. These adjustments are described in their direct testimony. The adjustments were also reflected in Section V of the Company's Application.

- In Company Witness Scott's Direct Testimony at page 10, she sponsored Adjustment W19, based on her review of the individual advertisements to remove political, promotional and institutional advertising from rate base disallowed by 807 KAR 5:016 Section 4(1).
- In Company Witness Bishop's Direct Testimony at page 4, he sponsored Adjustment W34 to remove certain non-recoverable business expenses such as tickets to sporting events.

Kentucky Power employs multiple daily business processes to ensure all expenses paid by the Company are reasonable in amount and required to provide adequate, efficient and reasonable service. These include the Company's invoice and approval process as well as a review of expenses to ensure they are recoverable. Consistent with Commission practice in the Company's prior rate cases, and to the Company's knowledge, past Commission practice in rate cases involving other utilities, the reasonableness of these previously reviewed and approved expense amounts for recovery is demonstrated by testimony and other evidence adjusting the Company's reasonable expenses for specific items not recoverable in rates under Kentucky law. The alternative, to identify each expense (or category of expense) and provide testimony expressly supporting its recovery would be unworkable, unprecedented, and unreasonable. In this case, Company Witnesses Scott and Bishop supported the exclusion of as prudent expenses that should be recovered.

Witness: Brian K. West

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_015** Refer to Kentucky Power's response to Commission Staff's Fourth Request for Information, Item 72(d). Explain in specific detail the basis for the assertion that the cost of the separate second time-of-day meter for electric vehicle charging is offset by the additional fixed cost contribution from the on-peak and off-peak energy charges. Any explanation should also include the assumptions and calculations used to determine costs and benefits of the proposal.

**RESPONSE**

Please refer to KPCO\_R\_KPSC\_PH\_15\_Attachment1 for the requested detail and calculations showing that the incremental annual non-fuel base rate revenue from an EV charging off-peak is estimated to be \$136.65 greater than the incremental annual cost of the separate AMI meter required to effectuate the separate meter EV charging provision.

Witness: Alex E. Vaughan

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_016** Refer to Kentucky Power's response to Commission Staff's Seventh Request for Information, Item 2, Attachment 1. Refile the Excel spreadsheet with consistent axis distribution of 150 kWh increments for the average monthly bill distribution # of bills by kWh ranges. Additionally, provide the distributions by month.

**RESPONSE**

Please refer to KPCO\_R\_KPSC\_PH\_16\_Attachment1 for the requested information.

Witness: Alex E. Vaughan

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

- KPSC\_PH\_017** Refer to the November 23, 2020 hearing testimony of Alex E. Vaughan regarding Kentucky corporate income tax for electric sales in other states.
- a. Provide a copy of the information provided by PJM Interconnection, LLC (PJM) to the AEP tax department that identifies the portion of electric sales to which state corporate income tax applies and the associated tax rates.
  - b. State whether Kentucky Power includes state income taxes in its cost-based bids into PJM. If so, provide the state income tax rate used in the calculation.
  - c. Provide Kentucky Power's state income tax returns in Michigan, Illinois, and West Virginia for years 2018 and 2019.

**RESPONSE**

- a. Please refer to KPCO\_R\_KPSC\_PH\_017\_Attachment1. PJM provides the Company with the percentage of load in each of the PJM states based upon a report from PJM's market monitor (Market Monitoring Analytics). In the years Kentucky Power has net revenue from wholesale market sales through PJM, the Company applies the percentages provided by the market monitor to the Company's net revenue from its wholesale market sales to establish the amount of sales attributable to each state in which the Company is required to file a state income tax return. Based on the respective income tax laws in the PJM states, the Company is only required to file state income tax returns in Kentucky, West Virginia, Michigan and Illinois, as demonstrated in subpart (c). PJM does not provide the Company with the state income tax rates. The state income tax rates are based on the state income tax laws in each state.
- b. Kentucky Power does not include state income taxes in its cost based bids into PJM.
- c. Please see KPCO\_KPSC\_PH\_017\_Attachments 2 - 7 for confidential state income tax returns in Illinois, Michigan, and West Virginia for years 2018 and 2019.

Witness: Allyson L. Keaton

Witness: Alex E. Vaughan



KPCO\_R\_KPSC\_PH\_017\_PublicAttachments 2 through 7 have  
been redacted in their entirety.

Kentucky Power Company  
KPSC Case No. 2020-00174  
Commission Staff's Post-Hearing Data Requests  
Dated November 30, 2020

**DATA REQUEST**

**KPSC\_PH\_018** Provide the most current cost of long-term debt issuance for 7-year, 10-year, 12-year, and 30-year tenors.

**RESPONSE**

The “most current cost of long-term debt” is not known nor measurable. It also is subject to adjustment for an individual issuer based on many factors including underlying treasury rates and additional credit spreads lenders require to determine the all-in rate. Credit spreads and their resulting impact on cost of debt are driven by many factors including credit worthiness of the issuer, environmental/social/governance issues related to dependence on coal-fired generation, economic conditions and issues related to the issuer, and broader market conditions and uncertainties.

Kentucky Power requested one of the banks AEP uses in connection with financings to provide information responsive to this request. The bank indicated the indicative pricing on December 2, 2020 reflective of then current market conditions, but subject to change at the time of the offering, and assuming execution via a best efforts private placement was:

- 7 year = 2.59% - 3.09%
- 10 year = 2.94% - 3.44%
- 12 year = 3.09% - 3.59%
- 30 year = 3.99% - 4.49%

As stated on page 5, lines 5 through 7 of Company witness Messner’s rebuttal testimony in this proceeding, “Replacing the existing cost rate on the Series A notes is not appropriate as those notes were part of the historical test year capital structure at March 31, 2020 and remain outstanding.”

Witness: Franz D. Messner



## KY Discovery Verification - Keaton.docx

DocVerify ID: DFF89EAB-6BEB-4358-8250-98B5B54EA7FD  
 Created: December 07, 2020 07:41:27 -8:00  
 Pages: 1  
 Remote Notary: Yes / State: OH

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to [www.docverify.com](http://www.docverify.com) at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

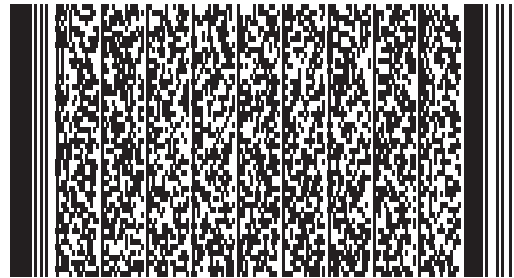
### E-Signature Summary

**Signer 1: Allyson Keaton (AK)**

December 07, 2020 07:48:38 -8:00 [61C4A8CEC177] [167.239.221.84]  
 alkeaton@aep.com (Personally Known)

**E-Signature Notary: Brenda Williamson (BW)**

December 07, 2020 07:48:38 -8:00 [A9A3475E55AE] [167.239.221.82]  
 bgwilliamson@aep.com  
 I, Brenda Williamson, did witness the participants named above electronically sign this document.





VERIFICATION

The undersigned, Allyson M. Keaton, being duly sworn, deposes and says she is a Tax Analyst Principle 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.

  
Signed on 2020/12/07 07:48:38 -8:00

Allyson M. Keaton

STATE OF OHIO

)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

12/07/2020 subscribed and sworn to before me, a Notary Public in and before said County and State, by \_\_\_\_\_, this \_\_\_\_ day of December 2020.

  
Signed on 2020/12/07 07:48:38 -8:00

Notary Public



DocVerify ID: DFF89EAB-6BEB-4358-8250-98B5B54EA7FD --- 2020/12/07 07:41:27 -8:00 --- Remote Notary



**VERIFICATION**

The undersigned, Brian K. West, being duly sworn, deposes and says he is Director Regulatory Services 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.




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 3<sup>rd</sup> day of December, 2020.

Regiana M.  
Sistevaris

 Digitally signed by Regiana M. Sistevaris  
Date: 2020.12.03 11:36:07 -05'00'

---

Regiana M. Sistevaris, Notary Public

My Commission Expires: January 7, 2023



## KY Discovery Verification - Whitney.docx

DocVerify ID: ABC3D808-0102-4D27-B9DB-0DC9155C2D98  
 Created: December 07, 2020 10:11:47 -8:00  
 Pages: 1  
 Remote Notary: Yes / State: OH

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to [www.docverify.com](http://www.docverify.com) at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

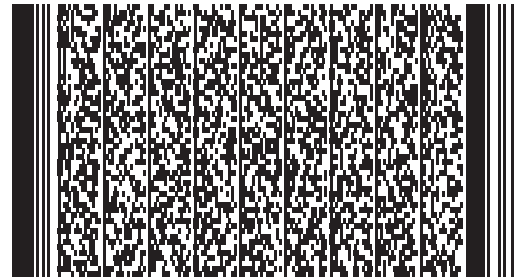
### E-Signature Summary

**Signer 1: Heather M. Whitney (HMW)**

December 07, 2020 10:35:48 -8:00 [0902E9420EFB] [167.239.2.88]  
 hmwhitney@aep.com (Personally Known)

**E-Signature Notary: Brenda Williamson (BW)**

December 07, 2020 10:35:48 -8:00 [8C2B98FA3A67] [167.239.221.82]  
 bgwilliamson@aep.com  
 I, Brenda Williamson, did witness the participants named above electronically sign this document.



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*  
Signed on 2020/12/07 10:35:48 -8:00

Heather M. Whitney

STATE OF OHIO

)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by  
12/07/2020 \_\_\_\_\_, this \_\_\_\_ day of December 2020.

*Brenda Williamson*  
Signed on 2020/12/07 10:35:48 -8:00  
Notary Public



ABC3D808-0102-4D27-B9DB-0DC9155C2D98 --- 2020/12/07 10:11:47 -8:00 --- Remote Notary



VERIFICATION

The undersigned, Scott E. Bishop, being duly sworn, deposes and says he is a Regulatory Consultant Senior 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.

Scott E. Bishop

Scott E. Bishop

COMMONWEALTH OF KENTUCKY

)

) Case No. 2020-00174

COUNTY OF BOYD

)

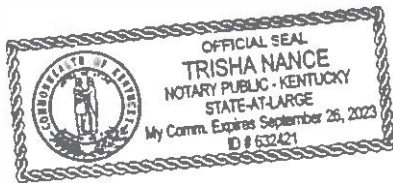
Subscribed and sworn to before me, a Notary Public in and before said County and State, by Scott E. Bishop, this 4<sup>th</sup> day of December 2020.

Trisha Nance

Notary Public

Notary ID Number: 632421

My Commission Expires: 9-26-2023





### KY Discovery Verification - Carlin.docx

DocVerify ID: 6591712D-2089-42F6-9FFF-4E166496A030  
Created: December 04, 2020 10:16:49 -8:00  
Pages: 1  
Remote Notary: Yes / State: OH

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to [www.docverify.com](http://www.docverify.com) at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

#### E-Signature Summary

**Signer 1: Andrew R. Carlin (ARC)**

December 04, 2020 10:32:45 -8:00 [03180721B9B3] [167.239.221.82]  
arcarlin@aep.com (Personally Known)

**E-Signature Notary: Brenda Williamson (BW)**

December 04, 2020 10:32:45 -8:00 [78126F0CD9B7] [167.239.221.85]  
bgwilliamson@aep.com  
I, Brenda Williamson, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Andrew R. Carlin, being duly sworn, deposes and says he is a Director of Compensation and Executive Benefits 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.

*Andrew R. Carlin*  
Signed on 2020/12/04 10:32:45 -8:00  
Andrew R. Carlin

STATE OF OHIO

)

) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by  
12/04/2020 \_\_\_\_\_, this \_\_\_\_ day of December 2020.

*Brenda Williamson*  
Signed on 2020/12/04 10:32:45 -8:00



6591712D-2089-42F6-9FFF-4E166496A030 --- 2020/12/04 10:16:49 -8:00 --- Remote Notary





## KY Discovery Verification - Vaughan.docx

DocVerify ID: 0068C7DD-3EF2-4087-8312-EB0B60380933  
 Created: December 07, 2020 09:42:03 -8:00  
 Pages: 1  
 Remote Notary: Yes / State: OH

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to [www.docverify.com](http://www.docverify.com) at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

### E-Signature Summary

**Signer 1: Alex E. Vaughan (AEV)**

December 07, 2020 10:03:41 -8:00 [77D6630870B6] [167.239.221.85]  
 aevaughan@aep.com (Personally Known)

**E-Signature Notary: Brenda Williamson (BW)**

December 07, 2020 10:03:41 -8:00 [FC5B3A3EEC70] [167.239.221.82]  
 bgwilliamson@aep.com  
 I, Brenda Williamson, did witness the participants named above electronically sign this document.





VERIFICATION

The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is a Director-Regulatory Pricing & Renewables 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.

*Alex E. Vaughan*  
Signed on 2020/12/07 10:03:41 -8:00

Alex E. Vaughan

STATE OF OHIO

)


) Case No. 2020-00174

COUNTY OF FRANKLIN

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by  
12/07/2020, this \_\_\_\_ day of December 2020.

*Brenda Williamson*  
Signed on 2020/12/07 10:03:41 -8:00



0068C7DD-3EF2-4087-8312-EB0B60380933 --- 2020/12/07 09:42:03 -8:00 --- Remote Notary



VERIFICATION

The undersigned, Lerah M. Scott, being duly sworn, deposes and says she is a Regulatory Consultant for Kentucky Power Company 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.



Lerah M. Scott

COMMONWEALTH OF KENTUCKY

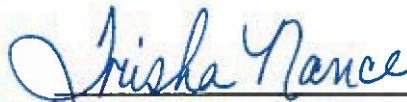
)

) Case No. 2020-00174

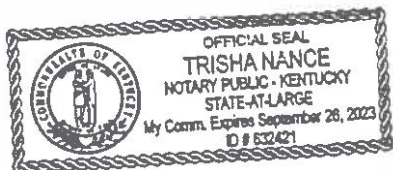
COUNTY OF BOYD

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lerah M. Scott, this 4<sup>th</sup> day of December 2020.



Notary Public



Notary ID Number: 632421

My Commission Expires: 9-26-2023

VERIFICATION

The undersigned, Adrien M. McKenzie, being duly sworn, deposes and says he is the President of FINCAP, Inc., 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.

  
Adrien M. McKenzie

STATE OF TEXAS

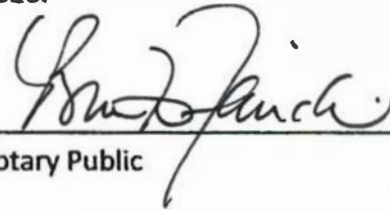
}

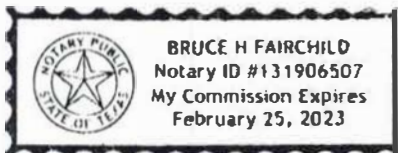
) Case No. 2020-00174

COUNTY OF TRAVIS

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by BRUCE H. FAIRCHILD, this 7<sup>th</sup> day of December 2020.

  
\_\_\_\_\_  
Notary Public



Notary ID Number: 131906507

My Commission Expires: 2/25/2023



## KY Discovery Verification - Messner.docx

DocVerify ID: AD97FE66-C9D6-45EA-B6C1-D50B99E78A20  
 Created: December 07, 2020 07:44:40 -8:00  
 Pages: 1  
 Remote Notary: Yes / State: OH

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system. This remote online notarization involved the use of communication technology.

Go to [www.docverify.com](http://www.docverify.com) at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

### E-Signature Summary

**Signer 1: Franz Messner (FDM)**

December 07, 2020 09:35:32 -8:00 [A61BDBF68B0A] [167.239.221.85]  
 fdmessner@aep.com (Personally Known)

**E-Signature Notary: Brenda Williamson (BW)**

December 07, 2020 09:35:32 -8:00 [8C5257892E5A] [167.239.221.82]  
 bgwilliamson@aep.com  
 I, Brenda Williamson, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Franz D. Messner, being duly sworn, deposes and says he is a Managing Director of Corporate Finance 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.

Franz Messner  
Signed on 2020/12/07 09:35:32 -8:00

Franz D. Messner

STATE OF OHIO )

)

) Case No. 2020-00174

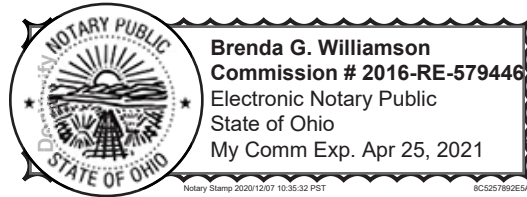
COUNTY OF FRANKLIN )

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by  
12/07/2020, this \_\_\_\_ day of December 2020.

Brenda Williamson  
Signed on 2020/12/07 09:35:32 -8:00

Notary Public



AD97FE66-C9D6-45EA-B6C1-D50B99E78A20 --- 2020/12/07 07:44:40 -8:00 --- Remote Notary

