

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
AMERICAN ELECTRIC POWER CO. INC.,)	
KENTUCKY POWER CO. AND LIBERTY)	CASE NO.
UTILITIES CO. FOR APPROVAL OF THE)	2021-00481
TRANSFER OF OWNERSHIP AND CONTROL)	
OF KENTUCKY POWER CO.)	

**JOINT RESPONSES OF THE ATTORNEY GENERAL AND KIUC
TO AEP/KENTUCKY POWER COMPANY'S POST-HEARING DATA REQUESTS**

The intervenors, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention (“AG”), and the Kentucky Industrial Utility Customers, Inc. (“KIUC”) submit the following joint responses to post-hearing data requests of AEP/Kentucky Power Company in the above-styled matter.

Respectfully submitted,

DANIEL CAMERON
ATTORNEY GENERAL



LAWRENCE W. COOK
J. MICHAEL WEST
ANGELA M. GOAD
JOHN G. HORNE II
ASSISTANT ATTORNEYS GENERAL
1024 CAPITAL CENTER DR., STE. 200
FRANKFORT, KY 40601
(502) 696-5453
FAX: (502) 564-2698
Larry.Cook@ky.gov
Michael.West@ky.gov
Angela.Goad@ky.gov
John.Horne@ky.gov

—and—

/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, OH 45202
(513) 421-2255
FAX: (513) 421-2764
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com

Certificate of Service and Filing

Pursuant to the Commission's Order dated July 22, 2021 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 parties of record. Counsel further certifies that the responses set forth herein are true and accurate to the best of their knowledge, information, and belief formed after a reasonable inquiry.

This 8th day of April, 2022



Assistant Attorney General

ELECTRONIC JOINT APPLICATION OF AMERICAN ELECTRIC POWER CO. INC., KENTUCKY POWER CO. AND
LIBERTY UTILITIES CO. FOR APPROVAL OF THE TRANSFER OF OWNERSHIP
AND CONTROL OF KENTUCKY POWER CO.

Case No. 2021-00481

Joint Responses of the Attorney General and KIUC to AEP/Kentucky Power Company's
Post-Hearing Data Request to Witnesses Kollen

QUESTION No. 1

Page 1 of 1

WITNESSES / RESPONDENT RESPONSIBLE:

LANE KOLLEN / Counsel as to Objection

Please provide the citations to the evidence of record in Case No. 2021-00481 referenced by Mr. Kollen at the March 29, 2021 hearing in support of his testimony that Kentucky Power's distribution system was not built to the applicable loading standard under National Electrical Safety Code Rule 250.

RESPONSE:

Objection. The question assumes facts not in evidence. Without waiving this objection, Mr. Kollen states: That was not Mr. Kollen's testimony. Mr. Kollen testified that the Company was in the process of modernizing and hardening its distribution system to a greater loading standard than it had previously applied and that this would reduce its future distribution maintenance expense, including storm damage expense. Mr. Kollen cited this as an example of the Company's historic underinvestment that resulted in greater distribution maintenance expense and greater storm damage. Mr. Kollen relied on his recollection of the response to KIUC 2-39 for this testimony, although he could not recall the specific source for this fact while on the witness stand. KIUC 2-39 (see copy of the response thereto attached hereto) sought information regarding the Company's efforts to reduce storm costs in the future after it had incurred \$86 million in the spring and winter of 2020 and in the winter of 2021 to repair weather related damage and restore service. In that response, the Company stated that it "is taking steps to minimize storm damage in the future." One of the steps the Company cited is that it is in the process of replacing or modifying over 210,000 poles and associated power lines to meet the NESC heavy loading requirements as compared to its prior standard of medium loading requirements.

American Electric Power Company, Inc.
Kentucky Power Company
Liberty Utilities Co.
KPSB Case No. 2021-00481
KIUC's Second Set of Data Requests
Dated February 4, 2022

DATA REQUEST

KIUC 2_39 With respect to the \$11 million incurred in the spring and winter of 2020 and the \$75 million incurred in winter 2021 to repair the system and restore service in response to severe weather and storms, provide a copy of all analyses, root causes, and/or all other critiques performed by or for the Company that address the scope of physical damages, cost to repair the system and restore service, and/or proposals and/or recommendations to minimize such storm damages in the future. If no such analyses were performed, then describe why the Company did not engage in any self-assessments or third-party assessments.

RESPONSE

The Joint Applicants object to this request on the basis that it seeks information that is outside the scope of this proceeding and that is neither relevant to this proceeding nor calculated to lead to the discovery of admissible evidence.

Subject to and without waiving this objection, the Joint Applicants state:

Each storm is unique in nature and after each storm, all charges were closely scrutinized to ensure accurate reporting of labor, equipment and material. The impacted areas were visually inspected to verify facilities were restored to normal and any hazardous conditions were mitigated. Some of the additional cost during the February 2021 storms were due to the fact there were three unusually destructive storms in one period that caused ice to accumulate to nearly one inch on trees and power lines. In addition, due to COVID protocols additional rooms and base camp trailers were needed to house employees and contractors.

No specific analyses were performed after the storms. However, Kentucky Power is taking steps to minimize storm damage in the future. Prior to 2014, Kentucky Power's distribution lines were built using the medium loading zone requirement of the National Electrical Safety Code (NESC), which means that the distribution line is built to withstand a 1/4 inch of ice. Although Kentucky is shown to be in the medium loading zone according to Figure 250-1 of the NESC (see JA_R_KIUC_2_39_Attachment1.pdf), in January of 2014, Kentucky Power began designing the distribution lines to meet heavy loading requirements, which means lines are now built to withstand up to a half inch of ice. It will take several years to replace or modify over 210,000 poles and associated power lines to meet the heavy loading zone requirements.

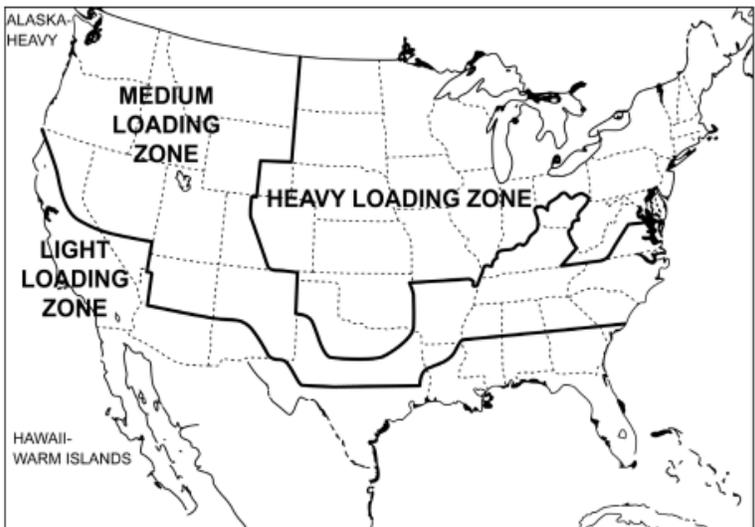
Kentucky Power would demonstrate the prudence of the costs at issue in a future rate proceeding in which it seeks recovery of those cost. See also the Joint Applicants' response to AG 2-3.

Witness: Brian K. West

F-250-1

Part 2: Safety Rules for Overhead Lines

F-250-1



The Warm Island Loading District includes American Samoa, Guam, Hawaii, Puerto Rico, Virgin Islands, and other islands located from 0 to 25 degrees latitude, north or south.

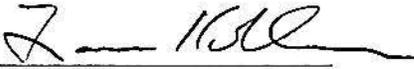
Figure 250-1—General loading map of United States with respect to loading of overhead lines

AFFIDAVIT

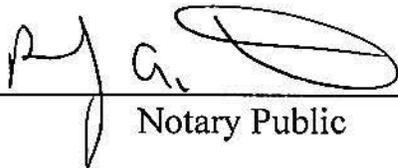
STATE OF GEORGIA)

COUNTY OF FULTON)

LANE KOLLEN, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.


Lane Kollen

Sworn to and subscribed before me on this
8th day of April 2022.


Notary Public

