

American Electric Power Company, Inc.
Kentucky Power Company
Liberty Utilities Co.
KPSC Case No. 2021-00481
Attorney General's First Set of Data Requests
Dated January 13, 2022

DATA REQUEST

AG 1_129 For each of the past three years, provide the total sum that KPCo has paid to AEPSC to perform services on behalf of KPCo.

a. Reference the Swain testimony at p. 8. Provide the budgetary impact of hiring 100 employees to perform the services that AEPSC performed on KPCo's behalf.

RESPONSE

Kentucky Power paid the following to AEPSC for the past three years:

2019 - \$71,191,271

2020 - \$70,441,890

2021 - \$75,198,283

Liberty expects to hire employees at prevailing wages in Kentucky which it expects to be consistent with costs currently incurred by AEPSC. Liberty anticipates using space in existing facilities and will leverage the existing fleet for field-based roles. Liberty anticipates a standard suite of end user technology.

These costs are expected to displace costs currently incurred by Kentucky Power through AEPSC.

Refer to the Confidential Attachment

JA_R_STAFF_1_19_ConfidentialAttachment_Liberty KY new jobs 3.xls provided in response to KPSC 1_19 to for details regarding the replacement labor cost.

Witness: Peter Eichler

MARCH 17, 2022 SUPPLEMENTAL RESPONSE:

Kentucky Power paid the following to AEPSC for the past three years:

2019 - \$75,955,630

2020 - \$70,441,890

2021 - \$75,198,283

See also the Company's response KPSC 3_1.

Witness: Stephan T. Haynes