

American Electric Power Company, Inc.
Kentucky Power Company
Liberty Utilities Co.
KPSC Case No. 2021-00481
Attorney General's Post-Hearing Data Requests
Dated March 31, 2022

DATA REQUEST

**AG_PHDR
_001** Provide a breakdown of the impact that the proposed “rate holiday” regarding the Big Sandy Decommissioning Rider (BSDR) would have on the average residential ratepayer’s bill, from the beginning of the rate holiday until the BSDR is completely paid off.¹ Please delineate between the deferral effects of the rate holiday itself, and any securitization which could occur in the event enabling legislation is enacted in the near future.

RESPONSE

Please see JA_R_KPSC_PHDR_04_Attachment.xlsx - tab “Savings Calculation” which looks at the customer savings during the proposed three year holiday and the securitization period.

Witness: Peter Eichler

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_002** In reference to Mr. Eichler's rebuttal testimony at 17:1-9, and to Kollen direct at 11-45, explain whether Liberty is willing to agree to a hold harmless condition that in the event the Commission in any subsequent KPCo rate case should find any or all of the following: (a) customer rates being impacted negatively by the proposed transaction; (b) acquisition premium is being charged to customers; and/or (c) KPCo's rates are increasing between 5-10% solely as a result of the dis-affiliation with AEP, then KPCo / Liberty will agree to full mitigation of all such negative rate impacts, and will agree not to contest the Commission's findings in this regard.

RESPONSE

In the Rebuttal Testimony of Peter Eichler, and as set forth in Exhibit PE-R4, Liberty has agreed that "[a]ll costs associated with the proposed transaction will not have the effect of increasing Kentucky Power's rates for electric service," that "Liberty will not seek to recover any transaction or one time transition costs (as defined by Liberty in testimony) from customers", and that Liberty will "[n]ot seek recovery of the transaction premium or transaction costs in Kentucky Power's rates." Thus, requests (a) and (b) have already been addressed. With regard to the request in paragraph (c), the Commission will have the opportunity to review Liberty's operating costs in Kentucky Power Company's next rate case, and thus can determine at that time whether there have been any increase in rates as a result of the dis-affiliation from AEP. It is unclear what "contest the Commission's finding" entails. However, Liberty cannot agree to waive its rights regarding a full and complete review of Kentucky Power's costs based upon Kentucky law.

Witness: Peter Eichler

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AG_PHDR Provide a list of all filings Liberty is making with the FERC regarding the
_003 proposed
transaction.

RESPONSE

Please see JA_R_AG_PHDR_03_Attachment1, which contains a list of filings by Liberty Utilities Co. and Kentucky Power Company, which collectively establish new, stand-alone tariffs for Kentucky Power related to Liberty Utilities Co.'s acquisition of Kentucky Power Company and AEP Kentucky Transmission Company, Inc. Some filings will not be required until after the close of the transaction.

Witness: Peter Eichler

FERC Filings of Liberty Utilities Co. (“Liberty”) Related to the Acquisition of
Kentucky Power Company (“Kentucky Power”) and AEP Kentucky Transmission
Company, Inc. (“Kentucky TransCo”)

Filing Name / Docket No.	Filing Date
Joint Application for Authorization Under Section 203 of the Federal Power Act for Disposition of Jurisdictional Facilities Docket No. EC22-26	12/22/2021
Kentucky Power Reactive Rate Tariff Filing Docket No. ER22-1099	2/23/2022
Kentucky Power and Kentucky TransCo Transmission Formula Rate Filing Docket No. ER22-1196	3/4/2022
Kentucky Power Market-Based Rate Tariff Filing Docket No. ER22-1410	3/21/2022
Kentucky Power and Kentucky TransCo FPA Section 204 filing	TBD
Kentucky Power and AEP East Operating Companies Transmission Interconnection Agreement under PJM Tariff	TBD
Kentucky Power Network Integration Service Agreement under PJM Tariff	TBD
Kentucky Power – Appalachian Power Interconnection and Local Delivery Service Agreements (ILDSA) under PJM Tariff	TBD
Kentucky Power –updates of various interconnection agreements with adjoining utility systems	TBD
Updates of Kentucky Power’s ILSDAs and Cost Based Service Agreements with Olive Hill and Vanceburg	TBD
Assignment of Mitchell Interconnection Agreement to Wheeling under PJM Tariff	TBD
Kentucky Power and AEP East Operating Companies Bridge PCA Agreement	TBD
Kentucky Power Company and AEPSC NERC-related coordination agreement	TBD
Updates of PJM OATT and CTOA to separate KPCO and KTCO from AEP in PJM	TBD

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AG_PHDR Have SAIDI and SAIFI Reports been filed with the Commission and EIA
_004 regarding the outages related to the severe winter storms that occurred in
the Kentucky Power service territory in February of 2021?

- a. If yes, please provide a copy of those reports or direct the
Intervenors to a location where those are accessible.
- b. If not, please identify when those are required to be filed and
when they will be filed.

RESPONSE

a.-b. The Company has not yet filed its 2021 SAIDI and SAIFI metrics with the
Commission or the United States Energy Information Administration ("EIA").

Annual SAIDI and SAIFI metrics are filed with the Commission as part of the
Company's Annual Reliability Report, which must be filed by May 1 of each year
pursuant to the Commission's order dated May 30, 2013 in Case No. 2011-00450. The
Company anticipates that the report will be filed on or before May 1, 2022.

The EIA releases annually its Annual Electric Power Industry Report, the data contained
in which is collected by survey from all United States utilities. Each year, American
Electric Power Service Corp., on behalf of Kentucky Power, submits the Company's
survey responses to EIA, which includes the Company's SAIDI and SAIFI metrics for
the prior year. EIA requests responses to the survey by April 30 of each year. The
Company anticipates that its survey responses will be submitted to EIA around April 30,
2022.

Witness: Brian K. West