

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

DATA REQUEST

KIUC 1_68 Refer to the Direct Testimony of Mr. Eichler at 30 wherein he states:
To ensure this critical outcome, professionals from Liberty, Kentucky Power, and AEPSC have been engaged in transition and separation planning activities since October 27 – the day after the proposed transaction’s announcement.

- a. Identify and describe each of the professional teams engaged in the transition and separation planning activities.
- b. Please provide a copy of all transition and separation planning documents, including overviews, goals and objectives overall and for each team and each functional area, task assignments and functions for each team and each functional area, status reports overall and for each team and each functional area, and all assessments of costs and savings developed by and/or considered overall and by each team and each functional area.

RESPONSE

a. Please refer to Transition Service Agreement provided as an exhibit the Stock Purchase Agreement (Exhibit 5 to the Application) and JA_R_KIUC_1_68_ConfidentialAttachment1 for a description of the AEP and Kentucky Power functions involved in the transition and separation activities.

Please see below for a description of the Liberty functions involved in the transition and separation activities.

Team	Description – Develop cutover and post-close plan for:
Finance	Accounting, financial reporting, budgeting, treasury activities, tax and accounts payable
HR	Compensation & benefits, payroll, recruiting/ talent management, labor relations, learning & development and internal comms
Supply Chain	Procurement, fleet, warehousing & inventory and facilities mgt.
Distribution	Electric distribution employees, assets and processes

Transmission	Electric transmission employees, assets and processes
Generation	Big Sandy employees, assets and processes
Commercial Operations	Fuel procurement, load forecasting and PJM settlements
IT	Establish network connectivity to Liberty and migrate from AEP to Liberty IT applications and manage cybersecurity
Risk & Compliance	Integration of activities into Liberty risk management and compliance processes; insurance
Regulatory & Legal	Legal and Regulatory employees, processes and ongoing litigation and rate activity
Customer	Customer care, billing, credit & collections

b. AEP objects 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. AEP further objects on the basis that the request is overly broad and unduly burdensome in that it is unbound in scope or duration and seeks voluminous, preliminary, and draft documents and information regarding activities that are currently underway.

Witness: Stephan T. Haynes

Witness: Peter Eichler

FEBRUARY 14, 2022 SUPPLEMENTAL RESPONSE:

b. 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. The Joint Applicants further object on the basis that the request is overly broad and unduly burdensome in that it is unbound in scope or duration and seeks voluminous, preliminary, and draft documents and information regarding activities that are currently underway.

Respondent: Counsel