

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
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DATA REQUEST

KIUC 1_61 Please provide the following estimated amounts for the forecast years available, including, but not limited to, a copy of all Excel and/or other files in live format with all formulas intact and a copy of all other source documents relied on for your response:

- a. Kentucky Power and Kentucky Transco non-fuel operation and maintenance expense by function and account, administrative and general expense by account, and other operating expenses by account and type of expense if the Liberty acquisition does not close. Separate the expenses into Kentucky Power and Kentucky Transco directly-incurred expenses and indirectly-incurred expenses charged by AEPSC to each of the acquired companies.
- b. Kentucky Power and Kentucky Transco non-fuel operation and maintenance expense by function and account, administrative and general expense by account, and other operating expenses by account and type of expense if the Liberty acquisition closes. Separate the expenses into Kentucky Power and Kentucky Transco directly-incurred expenses, indirectly-incurred expenses charged by AEPSC to Kentucky Power and Kentucky Transco pursuant to the Transition Services Agreement, and indirectly-incurred expenses charged by Liberty and other Liberty affiliates' to Kentucky Power and Kentucky Transco.

RESPONSE

- a. There are no documents responsive to this request.
- b. There are no documents responsive to this request.

Witness: Brian West

Witness: Peter Eichler

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FEBRUARY 14, 2022 SUPPLEMENTAL RESPONSE:

(a) 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 or calculated to lead to the discovery of admissible evidence. In support of this objection the Joint Applicants state that information concerning Kentucky Transco is not relevant to this proceeding as the transfer of Kentucky Transco is not at issue in this proceeding. Subject to and without waiving this objection, please see JA_SR_KIUC_1_61_Attachment1 through JA_SR_KIUC_1_61_Attachment3 for the requested information.

Witness: Brian K. West