COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

JOINT APPLICANT'S
REQUEST FOR INFORMATION TO OAG AND KIUC

American Electric Power Company, Inc. ("AEP"), Kentucky Power Company ("Kentucky Power" or the "Company"), and Liberty Utilities Co. ("Liberty") (collectively, "Joint Applicants"), by counsel, propound the following data requests upon the Office of Attorney General ("OAG") and Kentucky Industrial Utility Customers, Inc. ("KIUC"). OAG and KIUC shall respond to these requests in accordance with the provisions of the Commission's January 6, 2022, Order, applicable regulations, and the instructions set forth below.

INSTRUCTIONS

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.

2. The responses provided should restate Joint Applicants' request and also identify the witness(es) responsible for supplying the information.

3. If any request appears confusing, please request clarification directly from counsel for Joint Applicants.

4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If OAG or KIUC objects to any request on any grounds, please notify counsel for Joint Applicants as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,

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Request for Information

1. Identify by state and case number every regulatory case in which Lane Kollen or Stephen J. Baron have provided testimony related to an acquisition or merger of a regulated utility. Provide a copy of each pre-filed testimony and associated exhibits.

2. Please refer to Mr. Kollen's proposed condition 3 on page 60 of his direct testimony.

    a. Confirm that this proposed condition is meant to apply only to any future intercompany agreements that meet the requirements of KRS 278.2207.

    b. If your answer to subpart a is anything other than an unqualified confirmation, please provide the statutory basis or precedent to support Mr. Kollen's position that Liberty be required to seek approval of intercompany agreements that are not otherwise subject to the Commission's jurisdiction.

    c. Please provide the statutory basis or precedent for Commission approval of intercompany agreements for: (i) intercompany agreements between two companies that are not affiliates; and (ii) between affiliate companies where the agreements meet the pricing requirements of KRS 278.2207.

3. Confirm that Mr. Kollen did not account for any benefits to the Commonwealth of Kentucky associated with the additional employment opportunities proposed as a result of Liberty's acquisition of Kentucky Power Company. If your answer is anything other than an unqualified confirmation, please provide Mr. Kollen's analysis of, and any documents or workpapers related to, Mr. Kollen's consideration of those benefits.

4. Please refer to Lane Kollen's testimony, page 4, lines 2-7, where Mr. Kollen states, "The $1,625 million for the per books common equity is a premium of $625 million over the estimated $1,000 million in per books common equity for both entities, or a premium of 65%, if the transactions close in mid-2022. AEP and Liberty have not determined the actual allocation of the premium between the Company and Kentucky Transco, but estimate that 93.6%, or $585 million, will be allocated to the Company." Please provide the calculations to support, and all documents and workpapers related to Mr Kollen's position, of the alleged $585 million premium to be paid by Liberty to AEP to purchase the equity of Kentucky Power. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

5. Please refer to Mr. Kollen's direct testimony at page 14, beginning on line 2. Mr. Kollen claims that "if the acquisition results in net costs, then it is not in the public interest unless customers are protected and held harmless from the incremental costs." Please provide the statutory basis or precedent that supports this position or state that no such statutory or precedential support exists.

6. Please refer to Lane's Kollen testimony, page 15, lines 15-20, where Mr. Kollen states, "In any event, and beyond the offset to the Rockport fixed expense savings in 2023, there will be additional effects of the acquisition on customer rates on and after January 1, 2024 and continuing for decades thereafter if the transaction is approved and if the Commission does not impose additional conditions that compensate and hold harmless customers for these additional costs." Please provide detailed forecasting analysis including the associated workpapers that Mr. Kollen has prepared prior to filing his testimony to arrive at the conclusion that there will be "additional effects of the acquisition continuing for decades thereafter."

7. Provide Mr. Kollen's calculation of, and all documents and workpapers related to, the claimed annual expense savings from the ending of the Rockport U2 UPA. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values. Include the assumed replacement capacity and details for the source of the cost of the replacement capacity.

8. Please confirm that Kentucky Power's base rates would not change until its next rate case regardless of the entity who owns Kentucky Power Company.

9. Please Refer to Lane Kollen's testimony, page 16, lines 15-19, where Mr. Kollen states, "Under Liberty ownership, the Company will become a locally based standalone utility with the attendant standalone costs for each function and with significantly fewer centralized services provided by Liberty than were provided by AEP and AEPSC and otherwise available through other AEP entities and agreements. These costs would not be incurred, but for the acquisition." Please also refer to page 22, lines 11-13, where Mr. Kollen states, "The AEP model uses AEPSC to provide centralized services in a cost-effective manner at a lower cost than if the AEP utilities acquired or provided the services themselves locally and on a standalone basis."

    a. Please provide any information and analysis available to Mr. Kollen that would confirm that the actual operating costs of a standalone utility of comparable size to Kentucky Power (or one with a lower degree of integration with a corporate services company than Kentucky Power) would be lower than those of Kentucky Power under its current corporate structure.

10. Please refer to Lane Kollen's testimony, page 21, lines 11-12, where Mr. Kollen states, "AEPSC presently provides an extensive list of services to the Company that encompasses the full range of utility operations and administration." Also please refer to page 22, lines 7-10, where Mr. Kollen states, "In my experience, based on my involvement in dozens of acquisition and merger proceedings, it will increase the Company's non-fuel operation and maintenance ("O&M") expenses and administrative and general ("A&G") expenses by at least 5% to 10%."

    a. Please provide the calculation to support, and all documents and workpapers related to, Mr. Kollen's position that Kentucky Power's non-fuel operations and maintenance and administrative and general expenses will increase by 5%-10%.

The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

11. Please refer to Lane Kollen's testimony, page 22, lines 18-19, where Mr. Kollen states, "In fact, in my experience, the larger the utility holding company and centralized service provider, the greater the economies and savings."

    a. Please provide each and every analysis relied upon or completed by Mr. Kollen that informs this statement.

    b. Please explain the implied dichotomy between "economies" and "savings" as such terms are used by Mr. Kollen.

    c. Is it the testimony of Mr. Kollen that other utilities in Kentucky that have parent companies that are smaller than AEP are not as efficient as AEP? If so, please provide evidence for any such conclusion.

12. Please refer to Lane Kollen's testimony, page 23, line 9 through page 26, line 2, providing examples of past M&A transactions in Kentucky. Please state if it is the position of KIUC and the AG that no net savings or efficiencies are possible where the smallest utility in a multi-utility holding company leaves that holding company.

13. Please refer to Lane Kollen's testimony, page 27, lines 8-14, where Mr. Kollen states, "Yes. I conservatively quantified the increase in operating expenses at \$7.7 million to \$15.3 million annually. Over ten years, the increase in operating expenses will be \$76.7 million to \$153.4 million with a midpoint of \$115.1 million on a nominal dollar basis, or \$83.9 million on a net present value basis. I relied on the 5% to 10% savings from consolidation and centralized services savings I previously cited that will be lost if the consolidation and centralized services structure is largely reversed."

    a. Please confirm that Mr. Kollen's projected increase in operating expenses from the loss of the economies of scale was estimated by applying 5%-10% adders to Kentucky Power's current costs. If not confirmed, please describe in detail the methodology employed and the sources of assumptions used.

    b. Please state whether Mr. Kollen's analysis adjusts for any degree of a potential offsetting effect to the estimated cost increases attributable to the scale benefits of the functions that will be performed by Liberty's corporate organization and/or resource sharing with Liberty's other electrical utility affiliates. If no such adjustment has been made, please explain why.

    c. Please confirm that Liberty's analysis accounted for additions to the local workforce required to offset centralized services that are received today.

d. Please confirm whether Mr. Kollen's testimony accounted for wage differences between where centralized services are provided today by AEP in those instances.

e. Please provide Mr. Kollen's calculation of, and all documents and workpapers related to, Mr. Kollen's claimed estimated $83.932 million in increased costs due to lost economies from centralized services provided by AEPSC. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

14. Please refer to Lane Kollen's testimony, page 29, line 1. Provide all workpapers and documentation related to Mr. Kollen's estimate that Kentucky Power's termination of receivables to AEP Credit, Inc., will increase financing costs at $2.1 million on average and $15.3 million over 10 years on a net present value basis. In addition to providing this documentation, identify all assumptions made in Mr. Kollen's calculations on this issue. Any responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

15. Please refer to Lane Kollen's testimony, page 31, line 11. Provide all workpapers and identify all assumptions made by Mr. Kollen in calculating the impact on Kentucky Power's annual revenue requirement as a result of the asset NOL ADIT being included in rate base. Any responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

16. Please refer to Lane Kollen's testimony, page 32, line 13. Provide all workpapers and documentation related to Mr. Kollen's estimate that Kentucky Power's change in treatment of NOL ADIT will increase financing costs at $4.2 million on average and $27.8 million over 10 years on a net present value basis. In addition to providing this documentation, identify all assumptions made in Mr. Kollen's calculations on this issue. Any responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

17. Please refer to Lane Kollen's testimony, page 35, Line 8.

a. Provide all workpapers and documentation related to Mr. Kollen's estimate that a downrating will increase financing costs at $0.2 million on average and $7.3 million over 10 years on a net present value basis. In addition to providing this documentation, identify all assumptions made in Mr. Kollen's calculations on this issue. Any responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

b. Utilizing Mr. Kollen's $100 million in new long-term debt assumption, provide annual data for the last 20 years identifying the change in basis points for long-term debt differentiating between credit ratings of BBB+ and BBB.

18. Confirm that: (a) Kentucky Power's current credit rating from Moody's Investor Services is Baa3 stable; (b) Moody's has taken no action with respect to Kentucky Power's debt

since the sale of Kentucky Power from AEP to Liberty was announced in 2021; and (c) Kentucky Power's unchanged Moody's Baa3 stable rating is lower than Kentucky Power's current Fitch rating. If your answer to each of the above subparts is anything other than an unqualified confirmation, please provide the factual basis for and all documents supporting your response.

19. Please refer to Lane Kollen's testimony, Exhibit LK-11 including Fitch Ratings' October 28, 2021 Rating Action Commentary. Admit that Fitch Ratings affirmed Kentucky Power's Long-Term IDR on the basis that Kentucky Power's credit metrics are expected to improve and the anticipation that new ownership by Liberty will continue to support KPCo in a manner that will be consistent with Kentucky Power's current 'BBB' rating.

20. Please refer to Lane Kollen's testimony, Exhibit LK-11 including Fitch Ratings' October 28, 2021 Rating Action Commentary. Admit that in anticipation of new ownership of Kentucky Power by Liberty Fitch Ratings affirmed Kentucky Power's credit ratings based on the expectation that any conditions imposed by the Kentucky Public Service Commission (KPSC) in the approval of Liberty's anticipated new ownership of Kentucky Power will not be a deterrent to improved credit metrics of Kentucky Power.

21. Please refer to Lane Kollen's testimony, page 33, lines 5-11, where Mr. Kollen states, "Q. Describe the savings in financing costs on materials and supplies pursuant to the Affiliate Transactions Agreement for Sharing Materials and Supplies. A. The Company presently is a party to three AEP affiliate transactions agreements for sharing materials and supplies and capitalized spare parts whereby the inventory of certain materials and supplies and spare parts is shared among the AEP utility affiliates in order to ensure availability and minimize the investment and the related financing costs."

    a. Please explain whether Mr. Kollen is aware of any existing non-affiliated utility industry arrangements that provide for spare materials or equipment arrangements.

    b. Please confirm whether Mr. Kollen believes that there may be other approaches to extract supply chain efficiencies than through resource sharing. If confirmed, please list these other approaches.

    c. Please provide Mr. Kollen's calculation of, and all documents and workpapers related to, Mr. Kollen's claimed estimated $13.896 million in increased financing costs due to loss of shared inventory and spare parts with other AEP utility affiliates. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

22. Admit that Mr. Kollen's opinion that a total of approximately $354 million of distribution investment is necessary for Kentucky Power applies equally regardless of the identity of Kentucky Power's corporate parent.

23. Please refer to Lane Kollen's testimony, page 48 lines 6-8, where Mr. Kollen states, "Due to the Company's chronic underinvestment in distribution plant under AEP ownership, the Company under Liberty ownership will be required to invest significant capital expenditures to rebuild and upgrade its physical infrastructure."

24. Please confirm whether Mr. Kollen, KIUC, and/or the AG supported all distribution infrastructure investments and/or mechanisms associated with their recovery that Kentucky Power has proposed between 2011 and 2021. If not confirmed, please list all distribution infrastructure investments or recovery mechanisms and their total estimated capital cost that KIUC has not supported.

    a. Identify any proceeding before the Kentucky Public Service Commission since 2011 where the AG or KIUC advocated for increased investment in distribution plant in service.

    b. Please provide a list of each and every case since 2011 in which the AG or KIUC opposed distribution spending, distribution cost recovery, or distribution cost recovery mechanisms proposed or undertaken by Kentucky Power.

25. Please refer to the testimony of Lane Kollen and the table on page 48. Provide all workpapers and identify all sources of underlying information, as well as assumptions made, that form the foundation for this chart.

26. Please refer to Lane Kollen's testimony, page 8, line 19, where Mr. Kollen suggests that AEP had "chronic underinvestment in the distribution system" of Kentucky Power.

    a. Confirm that reasonable investment in distribution-system assets would have been included in rates.

    b. Identify each Kentucky Public Service Commission case in the past ten years which Kentucky Power sought a general adjustment in rates and KIUC sought to intervene. For each case, identify every issue raised by KIUC in sponsored testimony or legal brief that asserted Kentucky Power or AEP was underinvesting in Kentucky Power's distribution system.

    c. Identify each Kentucky Public Service Commission case in which Kentucky Power sought a general adjustment in rates in the past ten years and the AG sought to intervene. For each case, identify every issue raised by the AG in sponsored testimony or legal brief that asserted Kentucky Power or AEP was underinvesting in Kentucky Power's distribution system.

    d. Please identify any decision by the Kentucky Public Service Commission where the Commission that Kentucky Power demonstrated chronic underinvestment in the distribution system.

27. Provide Mr. Kollen's calculation of, and all documents and workpapers related to, the impact on residential retail rates if Mr. Kollen's estimated $354 million in required

distribution investments were implemented. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values. If Mr. Kollen has not performed this calculation, explain why he did not do so.

28. Provide Mr. Kollen's calculation of, and all documents and workpapers related to, the impact on the retail rates of customers represented by KIUC if Mr. Kollen's estimated $354 million in required distribution investments were implemented. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values. If Mr. Kollen has not performed this analysis, explain why he did not do so.

29. Please refer to Lane Kollen's testimony, page 50, lines 3-8, where Mr. Kollen states, "Q. Is the capital underinvestment also reflected in the Company's distribution maintenance expense per customer? A. Yes. The Company's distribution expense per customer is excessive. This is yet another metric to measure the Company's performance under AEP ownership by comparison to the other investor owned and cooperative utilities in the Commonwealth." Also refer to the Distribution Maintenance Expense Per Customer Per Year chart on page 51.

    a. Please provide the information on the maintenance expenses for the utilities displayed over the same years by:

        i. Distribution line miles;
        ii. Service Area Square miles.

    b. Please separate the maintenance expenditure data for all utilities and years provided in the original chart into Planned and Reactive maintenance expenditures. For the purposes of this data request, Liberty defines Reactive Maintenance as any maintenance work that has occurred as a result of a deficiency identified through inspection or patrol, or in response to an outage or another service call.

    c. Please provide the percentage of underground line miles for each of the four utilities referenced on the chart.

    d. Please confirm whether the unit expenditures provided in the chart include vegetation management expenditures. If confirmed, please provided the chart in its original form (i.e. maintenance per customer per year, without the vegetation-related expenses).

30. Please refer to Lane Kollen's testimony, page 54, lines 11-13, where Mr. Kollen states, "The Company under Liberty ownership will need to incur at least $203 million in capital expenditures and plant investment to improve the distribution system over the next ten years."

31. Please clarify whether the $203 million figure estimated represents an expenditure in addition to the 10-year expenditures forecasted by Kentucky Power and provided on page 52, whether the number represents the total distribution capital investment volume expected over the 10-year period, or whether it is intended to represent another form of an estimate.

32. Please provide Mr. Kollen's calculation of, and all documents and workpapers related to, Mr. Kollen's claimed estimated $203.627 million in increased costs due to additional distribution capital investment. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

33. Please refer to Lane Kollen's testimony, page 54, lines 16-20, where Mr. Kollen states, "I estimate the excessive distribution expense will decline from the present level of $25.2 million annually each year by 5% as the Company invests in the distribution system. Over the next ten years, I estimate the excessive distribution maintenance expense will be $151.0 million on a net present value basis."

    a. Please provide a copy of any utility engineering or economics literature or any other industry source supporting the calculation methodologies for:

        i. the "excess" expense amount of $25.2 million
        ii. the assumed 5% annual reduction in maintenance expenditures associated with capital replenishment.

    b. Please confirm that based on the stated rate of maintenance expenditure reductions and the associated 10-year NPV, there will remain approximately $15.7 million in "excess" maintenance expenditures at the end of the 10-year period. If confirmed, please describe how Mr. Kollen proposes to deal with that remaining excess cost. If not confirmed, please provide the remaining value and the method of calculation.

    c. Please confirm that based on Mr. Kollen's methodology and estimations, capital renewal "catch-up" has diminishing returns on the maintenance expenditures magnitude. If confirmed, please explain why this occurs using specific examples of maintenance programs and distribution equipment activities. If not confirmed, please explain why.

    d. Please provide Mr. Kollen's calculation of, and all documents and workpapers related to, Mr. Kollen's claimed estimated $150.955 million in increased costs of distribution maintenance expense until underinvestment remedied. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

34. Confirm that no statutory or precedential authority supports Mr. Kollen's position that the Commission could require AEP to pay $578 million in penalties in order to have the

transfer to Liberty approved. If your response is anything other than an unqualified confirmation, provide all copies of the authority that you claim exists.

35. Please provide the calculation to support, and all documents and workpapers related to, Mr. Baron's position that if the Commission accepts the AG/KIUC's proposed $578 million in penalties to AEP, that rate reduction and rate savings to the average residential customer would be approximately $2,034. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

36. Please provide Mr. Baron's calculation of, and all documents and workpapers related to, the estimated $75 million in ongoing transmission costs from other AEP utilities. The requested calculation and any other responsive Excel documents should be provided in an electronic format, with formulas intact and visible, and no pasted values.

37. Please refer to Stephen Baron's testimony, page 27, lines 2-7. Confirm that the "long-standing penalty" to which Mr. Baron refers is Kentucky Power's FERC-approved transmission rate.

38. Confirm that a change to Article 7.4 of the CTOA would require either a Section 206 complaint filed at the FERC or approval of a supermajority of the twenty-five transmission owners that are signatories to the CTOA.

    a. If confirmed, please explain the factual basis for Mr. Baron's conclusion that AEP would have a "much higher probability of success" in obtaining approval of the creation of a Kentucky Power standalone zone by a supermajority of the twenty-four other transmission owners or succeeding in a Section 206 complaint at FERC as compared to Liberty.
    b. If your answer is anything other than an unqualified confirmation, please explain: (i) the mechanism or process by which Mr. Baron believe Article 7.4 of the CTOA could be changed, and (ii) why Mr. Baron believes AEP would have a "much higher probability of success" in obtaining that change as compared to Liberty.

39. Please refer to Stephen Baron's testimony, page 13, lines 2-3. Please provide complete workpapers and back-up support for the assertion that over the years 2017-2022 an approximate $66 million subsidy was assigned to Kentucky Power. Please provide a narrative explanation of methodology, explicit citations including docket and exhibit numbers for sources used and provide live workpaper spreadsheets to the extent available that calculate these amounts.

40. Please refer to Stephen Baron's testimony, page 15, lines 12-18. Please indicate the extent to which Mr. Baron has calculated expected costs to Kentucky Power related to any exit from PJM. Please provide any calculations of such costs based on any study Mr. Baron has conducted and provide back-up workpapers.

41. Please refer to Stephen Baron's testimony, page 19, line 8. Please provide any support for the $12/CP MW basis identified in this line.

42. Please refer to Stephen Baron's testimony, page 19, lines 1-3. Please provide the workpapers, citations to data sources, and a methodological description of how the witness "normalized total revenue requirements charged to each Company by its 12CP MW."

43. Please refer to Stephen Baron's testimony, page 20, Figure 1. Please provide full back up and workpaper set including citations for sources as to revenue requirements and billing metrics (CP data) used to derive the results in the figure. Please provide full computations relied upon to chart each of the bars depicted in the graph with complete citation(s) to formula rate filing data and demand (CP) metrics. Please provide source data documents.

44. Please refer to Stephen Baron's testimony, page 20, lines 8-11, where Mr. Baron states, "Since 100% of the AEP LSE costs are allocated to the Operating Companies, this means that other Operating Companies are being allocated much lower costs under the Transmission Agreement than would be the case if they were charged their standalone revenue requirements." Please specifically identify which costs these Other Operating Companies would avoid under a "standalone" revenue requirement.

45. Please refer to Stephen Baron's testimony, page 22, Table 1. Please provide full workpaper support including citations for data and transmission revenue requirement information to demonstrate the derivation of all the figures in this table.

46. Please refer to Stephen Baron's testimony, page 24, Figure 2. Please provide a full methodological description of how these plots were derived. Please provide full workpaper support including citations for formula rate filings, 12CP and 1CP data and source of data, and all computations relied upon to derive the plots in this chart.