

Kentucky Power Company
KPSC Case No. 2023-00159
Walmart's First Set of Data Requests
Dated August 14, 2023

DATA REQUEST

Walmart Please provide the Company's initial and revised responses to all formal or
1_1 informal requests for information made by any party to this proceeding
when that response is provided to the requesting party, including any
responses already provided to any party.

RESPONSE

The Company objects to this request. Kentucky Power on May 12, 2023 filed its notice of election to use electronic filing procedures. Walmart was granted intervention by Order dated August 10, 2023. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission. Walmart thus is required by the Commission's regulations to view or download the requested information from the Commission's website. The requested information is therefore equally accessible to Walmart.

Respondent: Counsel

Kentucky Power Company
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DATA REQUEST

Walmart To the extent the Company files corrections, revisions, amendments,
1_2 supplemental information, and/or errata to its originally filed case, please
provide all updated materials including the Company's testimony,
exhibits, schedules, workpapers and models.

RESPONSE

The Company objects to this request. Kentucky Power on May 12, 2023 filed its notice of election to use electronic filing procedures. Walmart was granted intervention by Order dated August 10, 2023. 807 KAR 5:001, Section 8(8)(b) provides that in proceedings governed by the Commission's electronic filing procedures "each party shall be solely responsible for accessing the Commission's website at <http://psc.ky.gov> to view or download the submission. Walmart thus is required by the Commission's regulations to view or download the requested information from the Commission's website. The requested information is therefore equally accessible to Walmart.

Respondent: Counsel

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Walmart Please provide all workpapers in electronic spreadsheet format with
1_3 formulas intact, where available, supporting each of the figures, tables,
and exhibits accompanying the Company's filing and supporting
testimony.

RESPONSE

Please see Kentucky Power's response to KPSC 2_1. To the extent this request seeks the production of information beyond that provided in response to KPSC 2_1, the Company objects to the request as requiring the creation of information in a form that it does not exist, or as imposing an obligation that is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Witness: Brian K. West

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DATA REQUEST

Walmart Produce the workpapers in electronic format with all formulas intact for
1_4 the Company's Cost of Service Study ("COSS"), including but not limited
to the proof of revenue and unit cost study.

RESPONSE

Please see Kentucky Power's responses to KPSC 2_1 and KPSC 2_103. To the extent this request seeks the production of information beyond that provided in response to KPSC 2_1 and KPSC 2_103, the Company objects to the request as requiring the creation of information in a form that it does not exist, or as imposing an obligation that is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Witness: Brian K. West

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DATA REQUEST

Walmart Please refer to the Direct Testimony of Franz D. Messer at p. 11, lines 3-5,
1_5 discussing the \$37 million revenue requirement for the Securitization
Financing Rider ("SFR") and provide the revenue requirement breakdown
by rate class.

RESPONSE

See Exhibit MMS-5 to Company Witness Spaeth's Direct Testimony.

Witness: Brian K. West

Witness: Michael M. Spaeth

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DATA REQUEST

Walmart Please refer to the Direct Testimony of Alex E. Vaughan, p. 27, lines 6-
1_6 11, concerning the proposed Solar Garden program and explain how the
Company intends to allocate the costs of the proposed solar facilities.

RESPONSE

The Company's proposal is to collect the revenue requirement for the program through
Tariff PPA until a subsequent base rate case is filed and the projects are included in base
rates. Therefore, the associated cost allocation would follow the approved methodology
in Tariff PPA and subsequently in base rate cost of service and the resulting class cost of
service allocations.

Witness: Alex E. Vaughan

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DATA REQUEST

Walmart Please refer to the Direct Testimony of Timothy C. Kerns, p. 23, lines 3-5
1_7 and identify the specific date in November 2022 when the Company
extended the Planned Outage at Big Sandy Unit 1.

RESPONSE

Big Sandy Unit 1 began a Planned Outage on September 9, 2022. The outage was originally scheduled to be completed on December 4, 2022. On November 7, 2022, the Company extended the Planned Outage at Big Sandy Unit 1 to December 12, 2022, to complete the original scope of work, including the stator re-wedge. PJM approved the extension on November 9, 2022.

Witness: Timothy C. Kerns

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DATA REQUEST

Walmart Please refer to the Direct Testimony of Timothy C. Kerns, p. 23, lines 5-
1_8 10, and explain why the Company waited until December 2, 2022 to
replace the cracked retaining ring that was discovered on November 13,
2022.

RESPONSE

On November 13, 2022, a mechanic working on the generator noticed a drop of oil on the retaining ring and alerted plant management. The Company discovered a crack on the generator rotor collection end retaining ring and immediately engaged AEPSC Engineering Services to develop a thorough inspection procedure. The Company simultaneously engaged a third-party Non-Destructive Examination (NDE) contractor to determine the severity of the crack. The information gathered from Engineering Services and the NDE contractor resulted in the Company making the informed decision that the ring would require replacement. The severity of the crack, not ascertainable to the naked eye, meant that failure to replace the ring would increase the risk of catastrophic generator failure during unit restart.

During the period from November 13, 2022 until December 2, 2022 the Company was engaged in developing the procedure for fully examining the severity of the crack, performing the examination on the retaining ring, gathering engineering drawings from the generator manufacturer, searching for shops that could machine a new retaining ring, and developing a schedule for this emergent repair. The Company endeavored to complete the repair within the existing Planned Outage window but ultimately required additional time to complete the work and ensure the safety of the unit. On December 2, 2022, the Company requested that the Planned Outage at Big Sandy Unit 1 be extended through December 30, 2022 to complete the retaining ring repair. PJM approved the extension on December 6, 2022.

Witness: Timothy C. Kerns

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DATA REQUEST

Walmart Please refer to the Direct Testimony of Timothy C. Kerns, p. 23, lines 10-
1_9 12, and identify the specific dates when (i) the air leakage test was performed that uncovered the hydrogen seal leak; and (ii) the start up was attempted and uncovered a "condenser leak."

RESPONSE

(i) The Company identified a hydrogen seal leak at the exciter end of the generator during an air leakage test during the final testing of the generator assembly, which occurred on December 22, 2022.

(ii) The startup during which the condenser leak was discovered commenced on January 8, 2023. The leak was discovered on January 10, 2023 after the unit was safely removed from service and the condenser inspected for leaks.

Witness: Timothy C. Kerns

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DATA REQUEST

Walmart Please refer to the Direct Testimony of Everett G. Phillips, p. 22, lines 1-
1_10 8, where he discusses the efforts the Company took to target cutouts and
reduce Customer Minutes of Interruption ("CMI") by 72 percent and
identify all mechanisms used by the Companies to recover the costs of its
efforts to target cutouts during the period of 2008-2022.

RESPONSE

Historically, costs for such distribution programs have been recovered through base rates. The Company will continue to perform the replacement of cutouts as part of its Distribution Asset Management program, which is recovered through base rates. Moving forward, the Company plans to recover costs for the replacement of additional cutouts, not included in base rates, through the proposed DRR.

Witness: Everett G. Phillips

Witness: Brian K. West

Witness: Michael M. Spaeth

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DATA REQUEST

- Walmart
1_11** Please refer to the Direct Testimony of Brian K. West, p. 17, lines 4-13, and the Direct Testimony of Everett G. Phillips, p. 34, line 19 to p. 35, line 1 and Fig. EDP-10 discussing the Distribution Reliability Rider ("DRR") and answer the following:
- a. Are the budgeted or projected amounts proposed to be spent in any year of the Workplan subject to a cap or other limitation on spending?

 - b. If the Company's answer to Question 11(a) is no, under the Company's DRR proposal, will there be any proceeding where the Commission can review and approve the costs to be spent under the five-year work plan other than the current case? If so, what are all such proceeding(s).

RESPONSE

- a. Spending on DRR projects will be subject to Commission approval of the DRR Work Plan itself and the Commission's review of the Company's costs incurred in executing the Commission-approved DRR Work Plan.

- b. See the Company's response to subpart a. Please also see the Company's response to KPSC 2-5.

Witness: Everett G. Phillips

Witness: Brian K. West

Witness: Michael M. Spaeth

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DATA REQUEST

**Walmart
1_12** Please refer to the Direct Testimony of Everett G. Phillips, p. 37, lines 11-16, and identify any and all mechanisms by which the Company has recovered or proposes to recover the \$3,463,115 in Smart Grid investments in the Distribution System, including investments in Distribution Automation Circuit Reconfiguration ("DACR").

RESPONSE

The \$3,463,115 spent on Smart Grid was specifically invested in DACR. Historically, Smart Grid investments have been recovered through base rates. DACR is an important core Smart Grid technology and the Company's DRR proposal is to augment current Smart Grid spending with additional DACR and other projects to further improve reliability and the customer experience. See Company Witness Phillips' Direct Testimony at page 33 for discussion of the benefits of installing incremental DACR as part of the DRR.

Witness: Everett G. Phillips

Witness: Brian K. West

Witness: Michael M. Spaeth



Spaeth Verification Form.doc

DocVerify ID: 1E7A85EB-EDA5-438A-809D-7628335E409A
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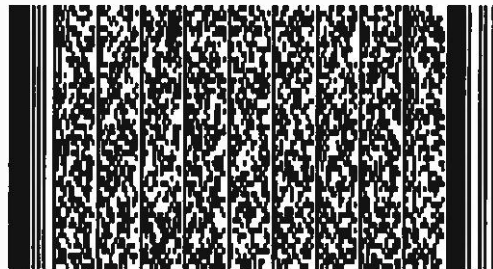
E-Signature Summary

E-Signature 1: Michael M Spaeth (MMS)

August 24, 2023 07:35:10 -8:00 [104F2A248A66] [167.239.221.107]
mmspaeth@aep.com (Principal) (Personally Known)

E-Signature Notary: Marilyn Michelle Caldwell (MMC)

August 24, 2023 07:35:10 -8:00 [149CA74924B4] [167.239.221.106]
mmcaldwell@aep.com
I, Marilyn Michelle Caldwell, did witness the participants named above electronically sign this document.



VERIFICATION

The undersigned, Michael M. Spaeth, being duly sworn, deposes and says he is the Regulatory Pricing and Analysis Manager for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Michael M Spaeth
Signed on 2023/08/24 07:11:25 -0500

Michael M. Spaeth

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2023-00159

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Michael M. Spaeth, on August 24, 2023.

Marilyn Michelle Caldwell
Signed on 2023/08/24 07:11:25 -0500

Notary Public

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
STATE AT LARGE KENTUCKY
Commission # KYNP71841
My Commission Expires May 05, 2027
Notary Stamp 2023/08/24 07:11:25 -0500

Notarial act performed by audio-visual communication

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

1E7A85EB-EDA5-438A-809D-7628335E409A -- 2023/08/24 07:11:25 -0500 --- Remote Notary



VERIFICATION

The undersigned, Alex E. Vaughan, being duly sworn, deposes and says he is the Managing Director – Renewables and Fuel Strategy for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.


Alex E. Vaughan

Franklin County)
)
Ohio)

Case No. 2023-001 59

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Alex E. Vaughan, on 8/24/23.



Notary Public

My Commission Expires Never

Notary ID Number No ID



Paul D. Flory
Attorney At Law
Notary Public, State of Ohio
My commission has no expiration date
Sec. 147.03 R.C.

