

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO AMERICAN ELECTRIC POWER COMPANY, INC.; KENTUCKY POWER
COMPANY; AND LIBERTY UTILITIES CO.

American Electric Power Company, Inc. (AEP), Kentucky Power Company (Kentucky Power), and Liberty Utilities Co. (Liberty) (collectively, Joint Applicants), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than April 8, 2022. The Commission directs the Joint Applicants to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Joint Applicants shall make timely amendment to any prior response if Joint Applicants obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Joint Applicants fail or refuse to furnish all or part of the requested information, the Joint Applicants shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, the Joint Applicants shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide a list of acquisition financing commitments received by Algonquin Power & Utilities Corp. (Algonquin), including but not limited to the name of the financing institution, financing amount, and financing terms.

2. Provide the projected and true-up AEP PJM Open Access Transmission Tariff, Attachment H-14 forms that AEP uses to allocate transmission revenue requirements to its operating company subsidiaries for its FERC formula rates for calendar years 2012 through 2020.

3. Provide the forecasted and true-up AEP PJM Open Access Transmission Tariff, Attachment H-20 forms that AEP uses to allocate transmission revenue requirements to its transmission company subsidiaries for its FERC formula rates for calendar years 2012 through 2020.

4. Refer to the March 28, 2022 Hearing Testimony of Peter Eichler (Eichler Hearing Testimony), generally. Provide the net present value, including carrying costs, of the projected savings to customers if the proposed Big Sandy Decommissioning Rider deferral is approved and securitization legislation is enacted after the three-year deferral period. Provide the response in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

5. Refer to the Eichler Hearing Testimony. Provide the net present value, including carrying costs, of the cost increase to customers from the proposed three-year deferral of Big Sandy Decommissioning Rider if securitization legislation is not enacted. Provide the response in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

6. Refer to Kentucky Industrial Utility Customers, Inc. (KIUC) Cross Exhibit 4, unnumbered page 1, which contains aggregate total amounts for Kentucky Power's distribution plant capital additions for calendar years 2011 through 2020, and budgeted distribution plant capital additions for calendar years 2022 through 2030. Provide, in the

same format, budgeted incremental distribution plant capital additions for calendar years 2011 through 2020. Further, for years 2011 through 2020, provide the changes in distribution costs from the Handy-Whitman Index, and if available provide the projected increases for distribution costs for calendar years 2022 through 2030.

7. Refer to March 28, 2022 Hearing Testimony of Michael McCuen, generally. If the transaction is approved, explain whether a change in the taxable position of Kentucky Power will impact the accumulated depreciated income tax (ADIT) included in the Big Sandy Decommissioning Rider regulatory asset.

8. Refer to the March 28, 2022 Hearing Testimony of Michael Mosindy (Mosindy Hearing Testimony), generally. Identify and describe the partners in Liberty Utilities Finance GP1 (Liberty GP1), a general partnership described by Mr. Mosindy as a dedicated financing entity.

9. Refer to the Mosindy Hearing Testimony, generally. Explain whether Liberty GP1 owns any assets. If so, describe the assets owned by Liberty GP1.

10. Refer to the Mosindy Hearing Testimony, generally. Explain whether Liberty GP1 has a tax basis. If so, provide and explain the genesis of that tax basis.

11. Refer to the Mosindy Hearing Testimony, generally. Provide copies of a representative group of financing documents between the following parties that are publicly available and related to a Liberty regulated utility subsidiary:

- a. Between Liberty GP1 and debt holders;
- b. Between Liberty GP1 and Liberty; and
- c. Between Liberty and a Liberty regulated utility subsidiary.

12. Refer to AEP's response to Commission Staff's First Request for Information, Item 67, Confidential Item 67, filed on January 28, 2022. Also refer to KIUC Confidential Cross Exhibit 1, introduced at the March 29, 2020 Hearing. Provide an updated version of page 8 of the document.

13. Refer to the March 29, 2022 Hearing Testimony of Stephan Haynes, regarding the proposed Big Sandy Decommissioning Rider deferral. Explain how the \$3.5 million offset provided by AEP affects the purchase price and provide a description of how this amount was determined.

14. Refer to the March 29, 2022 Hearing Testimony of James Llende. Provide the current accumulated deferred income tax and net operating loss carryforward balances for Kentucky Power and the balances if the transaction is approved.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 31 2022

cc: Parties of Record

*L Allyson Honaker
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*Hector Garcia
Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Kenneth Tillotson
,

*Angela M Goad
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*John C. Crespo
,

*Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Brian West
Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*James W Gardner
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Kentucky Power Company
Kentucky Power Company
1645 Winchester Avenue
Ashland, KY 41101

*Barry Alan Naum
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Jody M Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Carrie H Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NORTH CAROLINA 27103

*Joe F. Childers
Childers & Baxter PLLC
300 Lexington Building, 201 West Sho
Lexington, KENTUCKY 40507

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Christen M Blend
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216

*John G Horne, II
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Matthew Miller
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DISTRICT OF COLUMBIA 20001

*Dmitry Balashov
,

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Mark David Goss
Goss Samford, PLLC
2365 Harrodsburg Road, Suite B325
Lexington, KENTUCKY 40504

*J. Michael West
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Peter Eichler
,

*Sarah Knowlton
,

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Tanner Wolfram
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Post Office Box 16631
Columbus, OHIO 43216