Discovery Related to 2019 Projected Transmission Revenue Requirements
FERC Docket Nos. ER17-405 / ER17-406

Responses to AMP
Joint Customers’ Data Request Set 1

Data Request JI Set 1-1:
General: Please provide copies of data requests submitted by any other interested parties related to the 2019 PTRR and AEP’s responses to any such data requests. Please provide this information on a continuing basis.

Response:
The Company will comply with this request. At the time of this answer, no other party has submitted data requests on the East Transmission Formula PTRR for 2019.

Preparer of Response: David B. Weiss

Date: 5/9/2019
Data Request JI Set 1-2:
In order to further explain the relationship between development of the projected values in the 2019 PTRR and the corporate budgeting process, please provide the following:

a. A complete copy of AEP’s 2019 budgeting documents, in the form in which it was reviewed and approved by AEP senior management and/or Board of Directors, and all materials that were provided to senior management and/or the Board of Directors to support or explain the 2019 corporate budget.
b. A detailed reconciliation from the 2019 corporate budget to the projected 2019 values included in the 2019 PTRRs, including an explanation of any adjustments to amounts included in the corporate budget that were made in the course of developing the 2019 PTRRs.
c. A complete copy of AEP’s 2018 budget document, in the form in which it was reviewed and approved by AEP senior management and/or Board of Directors, including a specification of all budget assumptions.

Response:

NOTE:
The response to this question is considered Confidential or Highly Sensitive.

For access to this response, a signed Confidentiality Agreement is required.

Preparer of Response: Robert C. Myers

Date: 5/9/2019
Data Request JI Set 1-3:
For each OpCo, in reference to the worksheet entitled “TCOS,” Additional Revenue Requirement, Cell L39 is blank and according to the reference in Excel Cell D39 this item should be linked to Worksheet J/K, please state whether AEP intends to correct this error.

Response:
The Company will update this reference. There was no impact in the calculation of the revenue requirement due to this change.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-4:
For each TransCo, in reference to the worksheet entitled “TCOS,” IPP Contributions for Construction, Excel Cell G110 has an incorrect formula. The formula is currently referencing “WS D IPP Credits” tab Line 7 – Net Funds from IPP Customers instead of referencing Line 8 – Average Balance for Year as Indicated in Column ((ln 1 + ln 7)/2).
Please state whether AEP intends to correct the formula to properly reference Line 8.

Response:
The Company will revise the formula. There was no impact in the calculation of the revenue requirement due to this change.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-5:
In reference to “TCOS” tab in each 2019 PTRR, Line 175 in the TransCo formulas and Line 195 in the OpCo formulas – Excess Deferred Income Tax, please provide in a working electronic file format (i.e., in a functional Excel spreadsheet with formulas intact) the line items that total the amount in Column G. In addition, please identify whether AEP has categorized each item as either “protected” or “unprotected.”

Response:
The Excess Deferred Income Tax amounts in the 2019 projection are based on the 2018 amortization as determined prior to the third quarter of 2018, when the 2019 projections were prepared. Consequently, the estimates were prepared at a time when the total impact of the Tax Cuts and Jobs Act of 2017 was still being evaluated, and reflect estimates derived from professional judgement and the limited information available at that time.

Please see JI Set 1-5, Attachment 1 for a summary of the balances for the requested companies. Yellow highlighted column (7) shows the total company amount reported in the formulas, and column (14) shows the balances as functionalized to Transmission. Columns (5) and (6) present the protected and unprotected amortization amounts making up the total company amount in (7), and columns (12) and (13) comprise the total shown in column (14).

Preparer of Response: Michael N. Kelly
Preparer of Response: Diane M. Keegan
Preparer of Response: Jeffrey D. Hazlett
Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-6:
TCJA - What is the methodology that AEP East has utilized for each OpCo and TransCo for determining the flowback amortization period of the protected excess ADIT (e.g., Average Rate Assumption Methodology (“ARAM”), Reverse South Georgia Methodology (“RSGM”))? 

Response: 
The methodology that AEP East has utilized for each OpCo and TransCo for determining the flowback amortization period of the protected excess ADIT is the Average Rate Assumption Methodology (“ARAM”).

Preparer of Response: Michael N. Kelly

Preparer of Response: Allyson L. Keaton

Preparer of Response: Jeffrey D. Hazlett

Date: 5/9/2019
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Data Request JI Set 1-7:
TCJA - Verify that AEP used a 10-year amortization period for each OpCo and TransCo for the flowback amortization period of the unprotected excess ADIT in accordance with the settlement agreement in Docket Nos. ER17-405 and ER17-406.

Response:
AEP used a 10-year amortization period for each OpCo Transmission and TransCo Company for the flowback amortization period of the unprotected excess ADIT in accordance with the settlement agreement in Docket Nos. ER17-405 and ER17-406. The amortization was initially recorded in May 2018 and was effective January 1, 2018.

Preparer of Response: Michael N. Kelly
Preparer of Response: Allyson L. Keaton
Preparer of Response: Jeffrey D. Hazlett

Date: 5/9/2019
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Data Request JI Set 1-8:
TCJA For each AEP East OpCo and TransCo’s ADIT Accounts 190, 282 and 283, please:
a. Provide all assumptions related to the re-measurement of the deferred taxes reserves as a result of the TCJA;
b. Provide the detailed balances as of December 31, 2017 prior to reflecting the implementation of the TCJA (reflect 35% federal income tax rate);
c. Provide the detailed balances as of December 31, 2017 after reflecting the implementation of the TCJA (reflect 21% federal income tax rate); and
d. For each ADIT balance provided in subparts a. and b. above, indicate whether the ADIT is protected or unprotected, and the basis for such categorization.

Response:
For the calculation of the excess ADFIT, all Account 190.1, 282.1 and 283.1 ADFIT balances were multiplied by 40% (14% change in rate from 35% to 21%, divided by 35%) and recorded as excess ADFIT in Account 2834001 (for ADFIT in Accounts 190.1 and 283.1) and 2824001 for ADFIT recorded in Account 282.1, with the offset in Account 2544001. Gross-up of the excess ADFIT was recorded in 1904001 with the offset to Account 2544001.
b. See JI-8, Attachment 1.
c. See JI-8, Attachment 1.
d. Segregation of the excess ADFIT balances between protected and unprotected is determined by the Company’s software related to depreciable property using ARAM; once the software has determined the appropriate level of excess protected ADFIT based upon depreciable property, the remaining excess ADFIT is unprotected.

Preparer of Response: Michael N. Kelly
Preparer of Response: Allyson L. Keaton
Preparer of Response: Jeffrey D. Hazlett

Date: 5/9/2019
Data Request JI Set 1-9:
TCJA - If AEP East utilizes PowerTax software for income tax purposes to develop deferred income tax reserves and annual changes, provide a copy of Report 257 as of December 31, 2017, from PowerTax reflecting the deferred tax reserves by deferred tax item prior to the re-measurement required by TCJA. If AEP East uses a different tax software, please provide a copy of the report from that software that would include the detailed information requested.

Response:
See JI-9, Attachment 1 for requested information.

Preparer of Response: Michael N. Kelly
Preparer of Response: Allyson L. Keaton
Preparer of Response: Jeffrey D. Hazlett

Date: 5/9/2019
Data Request JI Set 1-10:
TCJA - Please provide a copy of the PowerTax Report 257 or other tax software report as of December 31, 2017, which reflects the deferred tax reserves by deferred tax item after reflecting the re-measurement required by the TCJA.

Response:
See response to JI-9 for requested information.

Preparer of Response:  Michael N. Kelly
Preparer of Response:  Allyson L. Keaton
Preparer of Response:  Jeffrey D. Hazlett

Date:  5/9/2019
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Data Request JI Set 1-11:
TCJA - For each deferred tax item reflected on the PowerTax Report 257 or other tax software report as of December 31, 2017, identify each as either:
   a. “Protected – Property-Related” – deferred tax item related to accelerated depreciation and therefore must be amortized using either the ARAM or RSGM.
   b. “Unprotected – Property-Related” – deferred tax item related to property, but not related to accelerated depreciation and therefore is not required to be amortized over a period determined by either ARAM or RSGM but can be over any reasonable amortization period.
   c. “Other” – deferred tax items which are not related to, or included in, the Formula Rate.

Response:
a. and b. See JI-9, Attachment 1 provided in the response to JI-9 for the requested information. Items identified as Fed Method/Life, Reg Tax/SL Tax, SL Tax/Midpoint (those items identified as "Depreciation Differences") are “Protected-Property Related”; all other items on the PowerTax Report 257 are Unprotected-Property Related.
c. N/A

Preparer of Response: Michael N. Kelly
Preparer of Response: Diane M. Keegan
Preparer of Response: Allyson L. Keaton
Preparer of Response: Jeffrey D. Hazlett

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Data Request JI Set 1-12: 
TCJA - For all non-property related ADIT, please provide the following:  
a. “Unprotected – Non-Property-Related” - deferred tax items not related to property, such as labor-related pensions, vacation, health benefits, deferred compensation, etc., and therefore not required to be amortized over a period determined by either ARAM or RSGM but can be over any reasonable amortization period.  
b. “Other” – deferred tax items which are not related to, or included in, the Formula Rate.  

Response:  
a. See JI-9, Attachment 1 provided in response JI-8 for the requested information.  
b. N/A  

Preparer of Response: Michael N. Kelly  
Preparer of Response: Diane M. Keegan  
Preparer of Response: Allyson L. Keaton  
Preparer of Response: Jeffrey D. Hazlett  

Date: 5/9/2019
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Data Request JI Set 1-13:  
To the extent AEP East has Net Operating Losses (NOL) related ADIT that is included in the formula rate for any of the OpCos and TransCos for each of the NOL items that are included in the formula rate, please:

a. Indicate whether AEP East has classified the excess ADIT related to the NOL as protected or unprotected or portions to both.

b. Indicate whether AEP East has performed the analysis of “with and with-out” required by the IRS and substantiated with Private Letter Rulings issued for the determination that the NOL is not related to bonus depreciation?

c. If AEP East has performed the analysis described in (b.) above, provide a complete copy of the analysis which determines that the NOL is not the result of, or related to, bonus depreciation

Response:

a. AEP East has classified the excess ADIT related to the NOL as unprotected.

b. AEP has not performed the analysis “with and with-out” required by the IRS and substantiated with Private Letter Rulings issued for the determination that the NOL is not related to bonus depreciation.

c. N/A

Preparer of Response:  Michael N. Kelly

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Allyson L. Keaton

Preparer of Response:  Jeffrey D. Hazlett

Date:  5/9/2019
Data Request JI Set 1-14:
To the extent AEP East has Removal Costs and/or Cost of Removal (COR) related ADIT that is included in the formula rate for any of the OpCos and TransCos, for each of the Removal Costs and/or Cost of Removal (COR) items that are included in the formula rate, please indicate whether AEP East has classified the excess ADIT related to the Removal Costs and/or COR as protected or unprotected. In addition, please indicate if any of the Removal Costs and/or COR are reflected in AEP East’s depreciation rates.

Response:
For the specific removal cost ADIT indicated in the formula rate, the excess associated with that specific ADFIT, has been classified as unprotected.

The companies follow FERC Electric Plant Accounting Instruction number 10 "Additions and Retirements of Plant" when accounting for cost of removal relating to replacements. As a result, cost of removal is reflected in the calculation of depreciation rates.

Preparer of Response:  Michael N. Kelly
Preparer of Response:  Diane M. Keegan
Preparer of Response:  Allyson L. Keaton
Preparer of Response:  Jeffrey D. Hazlett
Preparer of Response:  Jason A. Cash

Date: 5/9/2019
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Data Request JI Set 1-15:  
To the extent AEP East has ADIT related to Contributions in Aid of Construction (CIAC) included in the formula rate for any of the OpCos and TransCos, please provide the balance of the CIAC as of 12/31/17 and 12/31/18, by FERC account. In addition, please provide the basis for including the ADIT related to CIAC in the formula rate.

Response:  
Please see JI-9, Attachment 1 in the response to JI-9 for the CIAC differences as of 12/31/17 and 12/31/18 which would be initially recorded in Account 107 before being moved to Account 101. To the extent that AEP East has ADIT related to CIAC included in the formula rate, that same ADIT credit reversal is included in the ACRS Tax Depreciation ADIT amount as the CIAC reverses through tax depreciation. Therefore, both the set up and reversal of the CIAC recorded as ADIT need to be reflected in the formula rate.

Preparer of Response: Michael N. Kelly  
Preparer of Response: Diane M. Keegan  
Preparer of Response: Allyson L. Keaton  
Preparer of Response: Jeffrey D. Hazlett  
Preparer of Response: Jason A. Cash  

Date: 5/9/2019
Data Request JI Set 1-16:
For each OpCo and TransCo, “TCOS” tab, please provide a detailed breakout of the items and their associated amounts that make up the amounts in the line “Tax Effect of Permanent and Flow-Through Differences.”

Response:
Please see JI-5, Attachment 1 for the amounts in the line “Tax Effect of Permanent and Flow-Through Differences”. Flow-through depreciation is the only item reflected in the “Tax Effect of Permanent and Flow-Through Differences" line.

Preparer of Response: Michael N. Kelly

Preparer of Response: Diane M. Keegan

Preparer of Response: Allyson L. Keaton

Preparer of Response: Jeffrey D. Hazlett

Date: 5/9/2019
Data Request JI Set 1-17:
For each OpCo and TransCo, “TCOS” tab, please provide a detailed breakout of the items and their associated amounts that make up the amount in the line “Excess Deferred Income Tax.”

Response:
See JI-5, Attachment 1 referenced in response to JI-16 and JI-8, Attachment 1 in response to JI-8. As indicated on JI-8, Attachment 1, the individual ADFIT items were reflected at 21% with the total excess ADFIT being grouped together, segregated by account, between protected and un-protected.

Preparer of Response: Michael N. Kelly
Preparer of Response: Diane M. Keegan
Preparer of Response: Allyson L. Keaton
Preparer of Response: Jeffrey D. Hazlett

Date: 5/9/2019
Data Request JI Set 1-18:
APCO - In reference to the worksheet entitled “APCo TCOS,” Total Net Plant in Service, Excel Cell L95 has an incorrect formula, please state whether AEP intends to correct the calculation to be the summation of Excel Cells L90:L94.

Response:
The Company will make the requested correction. This issue does not have a financial impact because no production investment is allocated to the determination of the revenue requirement based on the operation of formula.

Preparer of Response: Diane M. Keegan
Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
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Data Request JI Set 1-19:  
APCO - In reference to the worksheet entitled “APCo TCOS,” Property, Excel Cell E183 has an incorrect reference, please state whether AEP intends to correct the reference to state “Worksheet H ln 24 (C)” as this is the referenced cell in Excel Cell G183.

Response:  
The Company will correct the described reference in cell G183 to reflect the described source of this input. The amount as reported is correct.

Preparer of Response:  
Diane M. Keegan  
Preparer of Response:  
Joshua P. Baluch  

Date:  
5/9/2019
Data Request JI Set 1-20:
APCO - In reference to the worksheet entitled “APCo WS F Misc Exp,” Account 930.1 Total, Excel Cell F61 has an incorrect calculation, please state whether AEP intends to correct the calculation to be the summation of Excel Cells F44:F59.

Response:
The Company will correct this calculation. This issue had no impact on the revenue requirement developed in the formula.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-21:
I&M - In reference to the worksheet entitled “I&M TCOS,” Total Net Plant in Service, Excel Cell L95 has an incorrect calculation, please state whether AEP intends to correct the calculation to be the summation of Excel Cells L90:L94.

Response:
The Company will make the requested correction. This issue does not have a financial impact because no production investment is allocated to the determination of the revenue requirement based on the operation of the formula.

Preparer of Response:  Diane M. Keegan
Preparer of Response:  Joshua P. Baluch

Date:  5/9/2019
Data Request JI Set 1-22:
I&M - In reference to the worksheet entitled “I&M TCOS,” Property, Excel Cell E183 has an incorrect reference, please state whether AEP intends to correct the reference to state “Worksheet H Ln 23 (C)” as this is the referenced cell in Excel Cell G183.

Response:
The Company will make the requested correction.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
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Data Request JI Set 1-23:
I&M - In reference to the worksheet entitled “I&M WS F Misc Exp,” Account 930.1 Total, Excel Cell F61 has an incorrect calculation, please state whether AEP intends to correct the calculation to be the summation of Excel Cells F44:F59.

Response:
The Company will make the requested correction. Correcting the formula did not have an impact on the projected revenue requirement.

Preparer of Response: Diane M. Keegan
Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-24:
KPCO - In reference to the worksheet entitled “KPCo TCOS,” Total Net Plant in Service, Excel Cell L95 has an incorrect calculation, please state whether AEP intends to correct the calculation to be the summation of Excel Cells L90:L94.

Response:
The Company will make the requested correction. Correcting the formula did not have an impact on the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-25:
KPCO - In reference to the worksheet entitled “KPCo TCOS,” Property, Excel Cell E183 has an incorrect reference, please state whether AEP intends to correct the reference to be “Worksheet H ln 24. (C)” as this is the referenced cell in Excel Cell G183.

Response:
The Company will make the requested correction. Correcting the formula did not have an impact on the projected revenue requirement.

Preparer of Response:  Diane M. Keegan
Preparer of Response:  Joshua P. Baluch

Date:  5/9/2019
Data Request JI Set 1-26:
KGPCO - In reference to the worksheet entitled “KGPCo TCOS,” Total Net Plant in Service, Cell L95 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells L90:L94.

Response:
The Company will make the requested correction. This correction did not have an impact on the projected revenue requirement because no production investment is allocated to functional rate base based on the operation of the formula.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-27:
KGPCO -In reference to the worksheet entitled “KGPCo TCOS,” Property, Cell E183 has an incorrect reference, please state whether AEP intends to correct the reference to be “Worksheet H In 24. (C)” as this is the referenced cell in Excel Cell G183.

Response:
The Company will make the requested correction. The corrected formula did not have an impact on the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
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Data Request JI Set 1-28:
KGPCO - In reference to the worksheet entitled “KGPCo WS C – Working Capital,”
Other Prepayments, Excel Cells K45 and K69, for conformity please state whether AEP
intends to change these to calculations and not inputted values

Response:
The Company will make the requested correction. The corrected formula did not have an impact
on the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-29:
KGPCO - Reference the “WS H Other Taxes” tab, Line 16 in the amount of $696,000, please provide a detailed explanation of what this amount represents.

Response:
The amount of $696,000 is related to state commission fees. State commissions review transmission rates, intervene in FERC proceedings, siting and various oversight of transmission rates and regulations.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-30:
KGPCO - Reference the “WS H Other Taxes” tab, Line 17 in the amount of $4,274,000, please provide a detailed explanation of what this amount represents.

Response:
Kingsport Power Company is required to pay franchise fees and taxes for the privilege of doing business in Tennessee. These amounts are the projected amounts Kingsport Power expects to pay in 2019.

Preparer of Response: Diane M. Keegan
Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-31:
OPCO - In reference to the worksheet entitled “OPCo TCOS,” Total Net Plant in Service, Excel Cell L95 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells L90:L94.

Response:
The Company will make the requested correction. This issue does not have a financial impact because no production investment is allocated to the determination of the revenue requirement based on the operation of the formula

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-32:
OPCO - In reference to the worksheet entitled “OPCo TCOS,” Property, Excel Cell E183 has an incorrect reference, please state whether AEP intends to correct the reference to state “Worksheet H ln 24. (C)” as this is the referenced cell in Excel Cell G183.

Response:
The Company will make the requested correction. The corrected formula did not have an impact on the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-33:
OPCO - In reference to the worksheet entitled “OPCo WS F Misc Exp,” Account 930.1 Total, Excel Cell F61 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells F44:F59.

Response:
The Company will make the requested correction. The corrected formula did not have an impact on the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-34:
WPCO - In reference to the worksheet entitled “WPCo TCOS,” Total Net Plant in Service, Cell L95 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells L90:L94.

Response:
The Company will make the requested correction. This issue does not have an impact on the revenue requirement because no production investment is allocated to the determination of the functional rate base based on the operation of the formula.

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Joshua P. Baluch

Date:  5/9/2019
Data Request JI Set 1-35:
WPCO - In reference to the worksheet entitled “WPCo TCOS,” Property, Excel Cell E183 has an incorrect reference, please state whether AEP intends to correct the reference to state “Worksheet H ln 22. (C)” as this is the referenced cell in Excel Cell G183.

Response:
The Company will make the requested correction. The corrected formula did not have an impact on the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-36:
IMTCO - In reference to the worksheet entitled “I&M Transmission TCOS,” Unfunded Reserves, Excel Cells G97 and L97 are blank and according to the reference in Excel Cell E97 the first cell should be linked to Worksheet A and the second cell should be a calculation, please state whether AEP intends to correct these errors.

Response:
The Company will make the requested correction. The corrected formula did not have an impact on the calculation of the projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

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Data Request JI Set 1-37:  
IMTCO - In reference to the worksheet entitled “I&M Transmission TCOS,” Less transmission plant excluded from PJM Tariff, Excel Cell L205 is blank and according to the reference in Excel Cell D205 the cell should be linked to Worksheet A, please state whether AEP intends to correct this error.

Response:  
The Company will make the requested correction. This correction did not impact the calculation of the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan  
Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-38:
IMTCO - In reference to the worksheet entitled “I&M Transmission WS F Misc Exp,” Account 930.1 Total, Excel Cell F64 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells F47:F62.

Response:
The Company will make the requested correction. The correction of this formula did not impact the calculation of the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-39:
OPTCO - In reference to the worksheet entitled “OH Transmission TCOS,” Unfunded Reserves, Excel Cells G97 and L97 are blank and from the reference in Excel Cell E97 the first cell should link to Worksheet A and the second cell should be a calculation, please state whether AEP intends to correct these errors.

Response:
The Company will make the requested correction.

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Joshua P. Baluch

Date:  5/9/2019
Data Request JI Set 1-40:
OPTCO - In reference to the worksheet entitled “OH Transmission TCOS,” Less
transmission plant excluded from PJM Tariff, Excel Cell L205 is blank and from the
reference in Excel Cell D205 the cell should be linked to Worksheet A, please state whether
AEP intends to correct this error.

Response:
The Company will make the requested correction. This correction did not impact the calculation
of the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-41:
OPTCO - In reference to the worksheet entitled “OH Transmission WS F Misc Exp,” Account 930.1 Total, Excel Cell F64 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells F47:F62.

Response:
The Company will make the requested correction. This correction did not impact the calculation of the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
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Data Request JI Set 1-42:  
WVTCO - In reference to the worksheet entitled “WV Transmission TCOS,” Less transmission plant excluded from PJM Tariff, Excel Cell L205 is blank and from the reference in Excel Cell D205 the cell should be linked to Worksheet A, please state whether AEP intends to correct this error.

Response:  
The Company will make the requested correction. This correction did not impact the calculation of the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-43:
WVTCO - In reference to the worksheet entitled “WV Transmission WS F Misc Exp,”
Account 930.1 Total, Excel Cell F64 has an incorrect calculation, please state whether AEP
intends to correct the calculation to equal the summation of Excel Cells F47:F62.

Response:
The Company will make the requested correction. This correction did not impact the calculation
of the 2019 projected revenue requirement.

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Joshua P. Baluch

Date:  5/9/2019
Data Request JI Set 1-44:
KPTCO - In reference to the worksheet entitled “Kentucky Transmission TCOS,”
Unfunded Reserves, Excel Cells G97 and L97 are blank and according to the reference in
Cell E97 the first cell should be linked to Worksheet A and the second cell should be a
calculation, please state whether AEP intends to correct these errors.

Response:
The Company will make the requested correction. This correction did not impact the calculation
of the 2019 projected revenue requirement.

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-45:  
KPTCO - In reference to the worksheet entitled “Kentucky Transmission TCOS,” Less transmission plant excluded from PJM Tariff, Excel Cell L205 is blank and according to the reference in Excel Cell D205 the cell should be linked to Worksheet A, please state whether AEP intends to correct this error.

Response:  
The Company will make the requested correction. This correction did not impact the calculation of the 201 projected revenue requirement.

Preparer of Response:  
Diane M. Keegan

Preparer of Response:  
Joshua P. Baluch

Date:  
5/9/2019
Data Request JI Set 1-46:
KPTCO - Reference the “WS A – Rate Base Support” tab, Column (h), please explain why AEP Kentucky Transmission does not project any general plant in service

Response:
Prior to 2018 AEP Kentucky Transmission had no general plant in service. At the end of 2018 AEP Kentucky Transmission booked communication equipment of approximately $34K. Because this is a de minimis, relative to total plant recorded on AEP Kentucky Transmission Company's books the amount was not specifically included in the forecasted balance of plant. Therefore, there was no projected general plant in service referenced on WS A Rate Base Support for 2019. (Forecasted balances of plant would include both the amount in service at the beginning of the forecast period, as well as additional amounts capitalized during the period.) And amounts of plant recorded as of the beginning of 2019, as well as during the year, will be picked up in the 2019 true-up to be prepared in 2020.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Discovery Related to 2019 Projected Transmission Revenue Requirements
FERC Docket Nos. ER17-405 / ER17-406

Responses to AMP
Joint Customers’ Data Request Set 1

Data Request JI Set 1-47:
KPTCO - In reference to the worksheet entitled “Kentucky Transmission WS F Misc Exp,” Account 930.1 Total, Excel Cell F64 has an incorrect calculation, please state whether AEP intends to correct the calculation to equal the summation of Excel Cells F47:F62.

Response:
The Company will make the requested correction. This correction did not have an impact on the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Data Request JI Set 1-48:
APTCO - In reference to the worksheet entitled “AP Transmission TCOS,” Unfunded Reserves, Excel Cells G97 and L97 are blank and according to the reference in Excel Cell E97 the first cell should be linked to Worksheet A and the second cell should be a calculation, please state whether AEP intends to correct these errors.

Response:
The Company will make the requested correction. This correction did not have an impact on the 2019 projected revenue requirement.

Preparer of Response: Diane M. Keegan

Preparer of Response: Joshua P. Baluch

Date: 5/9/2019
Discovery Related to 2019 Projected Transmission Revenue Requirements
FERC Docket Nos. ER17-405 / ER17-406

Responses to AMP
Joint Customers’ Data Request Set 1

Data Request JI Set 1-49:
APTCO - In reference to the worksheet entitled “AP Transmission WS F Misc Exp,”
Account 930.1 Total, Excel Cell F64 has an incorrect calculation, please state whether AEP
intends to correct the calculation to equal the summation of Excel Cells F47:F62.

Response:
The Company will make the requested correction. This correction did not have an impact on the
2019 projected revenue requirement.

Preparer of Response:  Diane M. Keegan

Preparer of Response:  Joshua P. Baluch

Date:  5/9/2019