



SUBJECT: AEP East Operating Companies' and East Transmission Companies' 2017 Formula Rate True Discovery Responses to Interested Parties.

East Joint Interveners (AMP et al) Transmission Formula Update FERC Docket No ER17-405-000;
ER17-406-000 Responses to
Set AMP-JI Set 1 of Data Requests

Because of their voluminous nature, attachments referenced in these responses will be provided based on an emailed request. Requests for attachments deemed confidential will require execution of a non-disclosure agreement prior to being provided.

Requests can be sent to:

David Weiss
American Electric Power Service Corporation
Regulatory Case Manager
dbweiss@aep.com

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-1:

Please explain why the actual 2017 Schedule 1A true-up rate of \$.0338/MWh is significantly lower than the projected 2017 Schedule 1A rate of \$.1000/MWh according to the customer presentation from May/June 2018.

- a. Was Total Load Dispatch and Scheduling costs in Account 561 significantly lower in 2017 than in 2016?
- b. Were Load Dispatch – Scheduling, System Control and Dispatch Services (Page 321 Line88 Column (b)) significantly different in 2017 than in 2016?
- c. Were Load Dispatch – Reliability, Planning & Standards Development Services (Page 321 Line 92 Column (b)) significantly different in 2017 than in 2016?

Response:

The primary driver of the reduction in Load Dispatch costs in 2017 compared to 2016 is a change in labor allocations between Operations & Maintenance (O&M) and Capital costs. In 2016, the O&M/Capital split was approximately 70%/30% for all AEP East Companies. In 2017, the split was approximately 53%/47%. Employees have always charged specific work orders when working more than four consecutive hours on a job. All other time is charged to overheads based on O&M/Capital splits defined for the Transmission Dispatch Centers. In the fourth quarter of 2016 Transmission Operations began capitalizing switching activities that pertained to capital projects. Where applicable, Transmission Operations was directed to charge the specific project if practical, but at a minimum, charge the capital overhead work order of the operating company that owned the asset. This change led to shifts from O&M to Capital that are reflected in the lower rates for Schedule 1A.

Preparer of Response: Diane Keegan

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-2:

Was the significant reduction in Schedule 1A ATRR in the 2017 true-up related in any way to movement of Schedule 1A costs into other accounts in 2017? If so, please identify the amount of cost that was moved into other FERC account(s).

Response:

Please refer to the response to JI Set 1-1.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
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Data Request JI Set 1-3:

Is the significant reduction in Schedule 1A revenue requirements for AEP east in the 2017 true-up related to AEP's filing in Docket No. ER18-2019? If so, please explain how it is related.

Response:

The decrease in schedule 1A occurred because of the reasons discussed in the response to JI Set 1-1. However, while preparing this schedule the company realized that it had not been recovering schedule 1A costs for its east Transmission companies, and filed the application in docket ER18-2019 to request recovery of these currently stranded costs.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
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Data Request JI Set 1-4:

Please provide copies of data requests submitted by any other interested parties related to the 2018 Updates 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 as other third parties submit their own requests for information.

Preparer of Response: David Weiss

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-5:

State whether AEP has identified any errors or items requiring correction in any of the 2018 Updates. If so, describe the error or correction and its effect on the relevant ATRR.

Response:

In the 2017 actual transmission formula (ATRR) rate filed in May 2018, AEP has not identified any errors or corrections relevant to the ATRR.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-6:

Please identify and quantify any full or partial write-offs that were booked to the transmission O&M accounts or A&G accounts of each of the OpCos and TransCos during 2017.

Response:

See JI 1-06 Attachment 1 for the requested detail.

Preparer of Response: Heather Crissinger

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-7:

For each OpCo, please provide the amounts associated with safety-related and educational advertisements, FERC Assessment Fees and Annual charges, state retail rate proceedings and other similar charges by FERC Account(s).

Response:

The requested balances related to safety and educational advertising are recorded in account 930.1, which is not recovered in the formula. The FERC assessment fees recovered in the formula are documented in the Company's response to JI Set 1-58.

Preparer of Response: Heather Crissinger

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-8:

Please indicate whether any “goodwill” or similar item of intangible value is reflected in any of the OpCo or TransCo capital structures as of December 31, 2017. If so, please identify the relevant entity or entities, the basis for the goodwill or other intangible value reflected, and the amounts reflected.

Response:

No goodwill was included in any of the December 31, 2017 capital structures provided in the OpCo or TransCo formula rates.

Preparer of Response: Christopher Duffy

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-9:

Please identify all charitable donation expenditures incurred during 2017 and included in each OpCo and TransCo formula rate update effective July 1, 2018. This identification should include, but not be limited to:

- a. Identification of the organization for which the expenditure or donation was made;
- b. Identification of each amount during 2017;
- c. Identification of the FERC Account where the expenditure or donation was recorded and identify the associated OpCo or TransCo that recorded the cost;
- d. Identification of all expenditures incurred in 2017 that would not have been incurred but for the charitable expenditure or donation, including the details on these expenditures requested in items a. through c. above; and
- e. If there were no charitable donation expenditures incurred during 2017 that have been included in any of the OpCo and/or TransCo formula rate updates effective July 1, 2018, then please identify the FERC Account(s) where such expenses were booked and their associated amounts.
- f. If there were no lobbying and other civic, political and related activities expenditures incurred during 2017 that have been included in any of the OpCo and/or TransCo formula rate updates effective July 1, 2018, then please identify the FERC Account(s) where such expenses were booked and their associated amounts.

Response:

Please see JI-1 009 Attachment 1 and Attachment 2 for the listing of each OPCO's and Transco's expenditures in 2017 for the items listed in question 9.

AEP is unaware of any other such expenditures recorded in the remaining O&M expense accounts referenced in the question. To the extent additional costs of these types are found, they will be corrected in 2017. AEP will provide a supplemental response to the question if any additional adjustments are recorded.

Preparer of Response: Brian Elswick

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-10:

Please identify all expenditures for lobbying and other civic, political and related activities incurred during 2017 and included in each OpCo and TransCo formula rate update effective July 1, 2018. This identification should include, but not be limited to:

- a. Identification of the organization for which the expenditure was made;
- b. Identification of each amount during 2017;
- c. Identification of the FERC Account where the donation was recorded and identify the associated OpCo or TransCo that recorded the cost;
- d. Identification of all related expenditures incurred in 2017 that would not have been incurred but for the expenditure for civic, political and lobbying activities, including the details on these expenditures requested in items a. through c. above; and
- e. If there were no lobbying and other civic, political and related activities expenditures incurred during 2017 that have been included in any of the OpCo and/or TransCo formula rate updates effective July 1, 2018, then please identify the FERC Account(s) where such expenses were booked and their associated amounts.

Response:

See JI 1-010 Attachment 1 for the requested information.

AEP is unaware of any other such expenditures recorded in the remaining O&M expense accounts referenced in the question. To the extent additional costs of these types are found, they will be corrected in 2017. AEP will provide a supplemental response to the question if any additional adjustments are recorded.

Preparer of Response: Brian Elswick

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-11:

Please state whether any allowances for Asset Retirement Obligations (“AROs”) are included in the 2017 ATRRs of any OpCo or TransCo. If so, please identify the relevant entity or entities, the basis for including the ARO(s) in question, the schedules and lines in which the ARO(s) are included, and the ARO amounts included in each.

Response:

No AROs were included in the ATRR of any OpCo or TransCo for 2017.

Preparer of Response: Diane Keegan

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-12:

Please provide a list of the pension contributions (by fund and \$ contributed), including the total dollar amount of such contributions, made by each OpCo and TransCo during 2017 and 2018 to-date.

Response:

AEP made the following pension contributions in 2017 to the qualified Pension plan trust for each operating company:

Appalachian Power Company: \$10,188,000

Indiana Michigan Power Company: \$12,975,000

Kentucky Power Company: \$2,226,000

Ohio Power Company: \$8,159,000

Kingsport Power Company: \$291,000

Wheeling Power Company: \$171,000

The funds were contributed into the general assets of the trust and not into a particular fund.

The TransCo companies do not have employees, so a pension contribution was not made for these companies.

Preparer of Response: Russell Doyle

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-13:

State whether AEP incurred or paid any monetary penalties for violations of NERC Reliability Standards during 2017. If so, please respond to the following:

- a. the amount of the penalties;
 - b. the FERC accounts where such penalties were recorded;
 - c. the nature of the alleged violation that gave rise to the penalty; and
 - d. the amount of the penalties included in each OpCo and/or TransCo formula rate updates.
- In responding to this request, please use the same response format as AEP used in answering the Joint Customers' data requests concerning the updates posted in May 2017

Response:

- a. The amount of penalties paid in 2017 was \$355,000.
- b. Two payments were recorded: \$205,000 to FERC account 4263001 and \$150,000 to FERC account 2420700.
- c. The nature of the violations are as follows:
 - i. Load Shed in 2014 = \$205,000 in TRE (FERC Docket NP17-18-000)
 - 1) Violation of EOP-003-2 R5: "...implement load shedding... in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown"
 - 2) Violation of TOP-001-1 R3: "...comply with reliability directives issued..."
 - ii. Security Patching = \$150,000 in RF, SPP, and TRE
 - 1) Violation of CIP-007-3 R3.1: "...document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability..."
- d. None of the penalties paid are included in the OpCo or TransCo rate updates.

Preparer of Response: Laurie Spears

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-14:

Please provide calculations of or the derivation of the Prepaid Pension Benefit included in the 12/31/2017 balance for each of the AEP East OpCos shown on the “WS-C – Working Capital” tab for each company.

Response:

For each AEP operating company, the Prepaid Pension Benefit is the cumulative balance of contributions to the qualified Pension trust net of actuarially determined pension expense.

Preparer of Response: Russell Doyle

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-15:

State whether, in the 2016-2017 timeframe, AEP implemented any changes in its accounting guidelines or procedures for any OpCo that affected the manner in which costs or revenues reflected in that OpCo's ATRR calculations are recorded. If so, describe each such change, specify the reason for the change, and quantify the impact of the change on the relevant ATRR.

Response:

There were no changes in accounting guidelines or procedures for the OpCo's that affected the manner of recordation of costs or revenues.

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: Craig Adelman

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-16:

State whether, in the 2016-2017 timeframe, AEP implemented any changes in its accounting guidelines or procedures for any TransCo that affected the manner in which costs or revenues reflected in that TransCo's ATRR calculations are recorded. If so, describe each such change, specify the reason for the change, and quantify the impact of the change on the relevant ATRR.

Response:

There were no changes in accounting guidelines or procedures for the TransCo's that affected the manner of recordation of costs or revenues.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-17:

Please provide a copy of the most recently completed audit of each **OpCo]** conducted by or on behalf of:

- a. FERC;
- b. any state regulatory commission; and
- c. any other entity with authority to conduct such audits. Please provide all correspondence and other documentation related to any such audit commenced but not yet completed, including any audit commenced at any point during the review period applicable to the 2018 Updates.

Response:

The OpCo financial statements have not been audited by the FERC, state regulatory commissions or any other entity in 2017. AEP has engaged Price Waterhouse Coopers to audit the OpCos' GAAP financial statements for inclusion in AEP's SEC Form 10-K and the FERC financial statements for inclusion in the FERC Form 1.

See JI-1-17 Attachment 1 for PWC's opinion contained in the 2017 10K

See JI 1-17 Attachment 2 for PWC's opinions for transmission companies'. FERC reports

See JI 1-17 Attachment 3 for PWC's opinions for operating companies' FERC reports.

See JI 1-17 Attachment 4 for the Commencement letter of an audit currently being conducted by FERC on Ohio Power Company.

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: David Weiss

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-18:

Please provide a copy of the most recently completed audit of each **TransCo]** conducted by or on behalf of:

- a. FERC; and
- b. any other entity with authority to conduct such audits. Please provide all correspondence and other documentation related to any such audit commenced but not yet completed, including any audit commenced at any point during the review period applicable to the 2018 Updates.

Response:

None of the AEP TransCo's have been subject to a FERC audit.

Preparer of Response: Rhoderick Griffin

Preparer of Response: David Weiss

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-19:

Please provide information identifying, by account, any costs reflected in the 2017 ATRR calculation for any **OpCo]** that were incurred, or the basis for which occurred, before January 1, 2017. Explain the reasons for including such prior-period costs in the 2017 ATRR calculations. If any such cost items instead were recorded in a deferred asset account (e.g., Account 186) or other FERC account used to reflect costs awaiting future recovery, please provide a table describing each such item and specifying the amount of each such item, the account where the item was recorded, and when recovery of the deferred item will begin.

Response:

There were no costs incurred prior to January 1, 2017 that were included in the OpCos' 2017 ATRR calculations.

Preparer of Response: Craig Adelman

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-20:

Please provide information identifying, by account, any costs reflected in the 2017 ATRR calculation for any **TransCo]** that were incurred, or the basis for which occurred, before January 1, 2017. Explain the reasons for including such prior-period costs in the 2017 ATRR calculations. If any such cost items instead were recorded in a deferred asset account (e.g., Account 186) or other FERC account used to reflect costs awaiting future recovery, please provide a table describing each such item and specifying the amount of each such item, the account where the item was recorded, and when recovery of the deferred item will begin.

Response:

There were no material costs incurred prior to January 1, 2017 that were included in the TransCo's 2017 ATRR calculations.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-21:

For APCo and Kentucky Power, please explain the derivation of and provide supporting workpapers (Excel format) for the “Net Value of Exempted Generation Plant” figures used to calculate the “Taxable Property Basis” in each state jurisdiction as outlined in the tab entitled “Worksheet H Other Taxes.”

Response:

Please see JI Set 1-21 Attachment 1 for the supporting workpaper for Net Value of Exempted Generation Plant figures used to calculate the taxable property basis in each state jurisdiction.

Preparer of Response: Thomas Johnson

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-22:

For any OpCo substation that serves a dual function (i.e., transmission and distribution), please provide a list of these substations including (i) voltage level, (ii) when substations were placed into service (iii) FERC account(s) where these assets are recorded and (iv) a detailed description of how the costs of these dual-use substations were allocated to the transmission and distribution functions. In addition, please provide one-line diagrams of the dual-use substations.

Response:

AEP Ohio is the only Operating Company that has assets within a substation that are split between transmission or distribution. The other Operating Companies follow the primary use of the substation for determining whether transmission or distribution own the substation assets. The primary use can be located for each substation over 69kV on the FERC Form 1 for each Operating Company. Please see Attachment 1 for a list of "dual function" substations in AEP Ohio with their corresponding voltage (i). The date the stations were placed in service is not readily maintained, however, the vintage year of the substation is also listed in Attachment 1.

Station equipment identified as Distribution plant are recorded to FERC Account 362 and Station equipment identified as Transmission plant are recorded to FERC account 353.

iv) Costs associated with each facility are directly assigned to Transmission or Distribution based on their function. For general O&M associated with the facilities, costs are allocated to transmission and distribution based on each business unit's share of the station.

The requested one-line diagrams are critical energy infrastructure information (CEII) and will be made available at AEP's headquarters. Alternatively, AEP will provide Joint Customers with the requested one-line diagrams upon the approval of an FOIA Request at FERC. An electronic FOIA request form may be found at the following link:

<https://www.ferc.gov/legal/ceii-foia/foia/foia-new-form/FOIARequest.aspx>

Preparer of Response: Laurie Spears

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-23:

Please verify whether any Operations and Maintenance (“O&M”) expenses were transferred or allocated from an OpCo to a TransCo. If yes, please provide the following:

- a. A detailed list of the expenses that were transferred and their associated amounts transferred to a TransCo by FERC account; and
- b. A description of the allocation methodology used to transfer the expenses from the OpCo to the TransCo.

Response:

The companies do not transfer costs amongst affiliates; however, AEP affiliates provide service to other AEP affiliates as a normal course of business. AEP uses a work order system to ensure that services provided by one business unit that benefit other business units are properly billed to the entities benefitting from that service. AEPSC is the primary service provider to the TransCo’s. However, since the TransCo’s do not have employees, they also rely on other AEP affiliates or third party vendors to provide necessary services. All services provided to affiliates are billed at cost. Labor charges billed between AEP affiliates represent the fully-loaded cost of labor, inclusive of benefits and administrative costs. Please refer to JI 1-23 Attachment 1 for the requested information.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-24:

For OpCo and TransCo lay down yards for materials and supplies, please provide the following:

- a. A description of how AEP separates materials and supplies in lay down yards between an OpCo and TransCo;
- b. Provide the allocation methodologies used for splitting materials and supplies between an OpCo and TransCo;
- c. A detailed description of how lay down yards are managed (i.e., by AEP or a third-party, protocols for handling inventory, etc.);
- d. Whether these materials and supplies are being recorded into Accounts 154, 107, or capitalized to plant: and,
- e. Identify where labor related to these laydown yards are recorded by FERC account. In addition, please verify whether this labor is being split between the OpCos and TransCos.

Response:

- a. All OpCo and TransCo material in the laydown yards is physically separated by project and then by work order. Each project has a binder which logs all the material received for the job. The material is also staged in separate yard locations for the larger items and all the smaller material is kitted on skids and stored in its own storage container. All containers are tagged with the specific project name and work orders.
- b. AEP does not split / share any material and supplies between an OpCo and a TransCo. All OpCo and TransCo projects are managed as separate organizations.
- c. Laydown yards are managed by AEP personnel. The organization consists of an exempt Supervisor for each state, with regional Field Operations Assistants that oversee an assigned territory. Each Field Operations Assistant is assigned 4-6 laydown yards and is responsible for all the day to day operations. Each laydown yard will have a Stores Attendant and 3-6 Material Handlers depending on the number of projects assigned to that yard. The material is ordered by the specific business unit via material requisitions and routed through the supply chain material coordinators team. This team will route the internal request to the Regional Distribution Centers (RDCs) and the external request to the Procurement department for sourcing. As the material is received at the laydown yards the Stores Attendant will verify correct items and quantities that are received and will process a receipt in the inventory management system which clears the invoicing for Accounts Payable. The material is then logged in the project binder and assigned a specific location. As needed, the construction contractors will pick up the material and sign the packing slips. This management structure is standard for all laydown yards managed by AEP throughout the system.

d. All material in the laydown yards is capital (Account 107), direct charged material that has already been issued to the job by one of two ways: 1) Transfer of materials - when the RDC fills the internal material requisition, or 2) Purchase of materials - when the Stores Attendant creates a Purchase Order receipt for direct shipped material that was listed on the external material requisition.

e. The labor at the laydown yards is allocated based on the split between the OpCo and TransCo projects being serviced from that location.

Preparer of Response: Laurie Spears

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-25:

Please describe how AEP handles scrap value for any assets retired (i.e., record any revenue to Account 454/456, or include it as an offset in Retirement Work in Process – tied to a specific asset). In addition, please verify whether these revenues are included as a reduction to rates

Response:

The Company follows FERC Electric Plant Accounting Instruction number 10 "Additions and Retirements of Plant" when accounting for the value that is received for the scrap of its assets (i.e. gross salvage). FERC's instruction requires that gross salvage be credited to accumulated depreciation, or FERC account 108.

Preparer of Response: Laurie Spears

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-26:

In relation to AEP's membership in Grid Assurance, please provide the following:

- a. Verify whether Grid Assurance keeps similar spares to the ones held at AEP East.
- b. Where the expenses related to this membership are recorded by FERC account and the associated amounts.
- c. The number of spares received from the Grid Assurance membership and utilized by OpCo and TransCo during 2017.

Response:

No Grid Assurance expenses were incurred during the period covered by this Annual Update. Consequently, AEP is not providing responses to questions concerning Grid Assurance as they are outside the scope of the Annual Update review.

Preparer of Response: Laurie Spears

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-27:

In relation to EPC Contracts, please provide (i) the guidelines for how the contracts are bid, (ii) whether they are all sent for competitive bid, and (iii) the number sent for competitive bids versus the total number of contracts in 2017 for each OpCo and TransCo.

Response:

i) The Company does not have a specific "guideline for how the contracts are bid". Projects that are not competitively bid are assigned to contractors that have undergone a vetting process.

ii) Not all contracts for EPC projects were competitively bid.

iii) Out of the 26 EPC projects in 2017, 8 were competitively bid. The remaining projects were directly assigned. The breakdown per operating company is as follows: APCo=3 Competitively bid/ 6 direct assigned. OpCo= 3 competitively bid/ 9 direct assigned, I&M= 2 competitively bid/3 direct assigned.

Preparer of Response: Laurie Spears

Date: 9/19/2018

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**Responses to
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Data Request JI Set 1-28:

In relation to AEP's subsidiary BOLD Transmission, LLC ("BOLD"), BOLD states on its website that "Recognizing common challenges faced by the industry, American Electric Power (AEP) asked its engineering teams to find a way to move more power through an existing right-of-way, with structure acceptable to customers. The engineers delivered not only a solution for increased capacity but a design that enables reduced structure heights and increased efficiencies." Please identify whether the expenses related to AEP's engineering team labor for research and testing (e.g., EPRI, Hubbell Power Systems, Burndy or Valmont, etc.) were recorded in any OpCo or TransCo's FERC Form 1. If so, please identify the associated amounts and FERC account(s), for each OpCo or TransCo.

Response:

BOLD Transmission, LLC ("BOLD") is a legal entity and has its own separate General Ledger Business Unit in AEP's accounting system. All costs related to BOLD have been borne and recorded on BOLD's ledger or its parent, AEP Transmission Holding Company, LLC, not AEP's OpCo's or TransCo's.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-29:

For each OpCo, reference the worksheet entitled “WS H Other Taxes,” Lines 15 – 22, please provide the description of each miscellaneous tax that these amounts represent.

Response:

The detail for each operating company's individual miscellaneous tax amounts are presented in column (i) of page 262 of that respective company's FERC Form 1.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-30:

Please provide a copy of any seven-factor test done by or for each OpCo and TransCo or the owner of the facilities prior to AEP East (original owner of the facilities) to determine if all its transmission facilities satisfy the test as “transmission” or “not distribution.”

Response:

The OpCos and TransCos do not complete formal “seven-factor test(s)” for facilities, however, the methodology for determining the predominant use or function of individual assets is based on the guidelines outlined in the Commission’s seven-factor test.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-31:

For every related transmission facility (station or line) identified in response to (JI 1-30), (a) confirm that all customers served at the same voltage level as the identified facility are not paying any associated distribution costs; (b) identify the voltage level of the transmission facility providing service; (c) identify the voltage level in which the customer is taking service.

Response:

Please see the response to JI Set 1-30.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-32:

Please provide cites to any seven factor tests for any OpCo or TransCo transmission facilities that were submitted to state regulatory bodies or the FERC

Response:

The Companies did not submit any seven factor tests to either state regulatory bodies or FERC in 2017. Please see the response to JI Set 1-30.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-33:

Please state whether there are radial transmission facilities included in the gross plant investment in any OpCo or TransCo formula rate.

Response:

Yes.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-34:

Please provide a list of all radial transmission facilities (lines and other facilities supporting those radial lines) on an OpCo or TransCo System identified in the following manner: a. Provide a list of all radials that terminate at facilities owned by a single customer;

- b. Provide a list of all radial facilities serving multiple retail customers;
- b. Provide a list of all radial facilities serving multiple retail customers;
- c. Provide a list of all radial transmission lines that are operated “normally open” but could be closed;
- d. Provide the name of the radial facility;
- e. Provide the location of each radial facility;
- f. Provide the length in miles of each radial transmission line; and,
- g. Provide the number of customers on each radial transmission line.

Response:

Please see JI Set 1-34 Attachment 1 for the requested information. Please note (c) is not readily maintained by the Company and is not included with this response.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-35:

Please identify the types of customers (retail, municipal, cooperative, industrial, etc.) and the number of such customers served off each radial line segment included in the gross plant investment in each OpCo and TransCo formula rate.

Response:

Please see the Company's response to JI Set 1-34.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-36:

Identify the voltage demarcation point at which each OpCo and TransCo considers a facility “transmission.”

Response:

AEP does not classify transmission and distributions using a bright line standard. An asset’s classification is determined by its function. Major assets within a substation such as transformers, breakers, etc. are booked as either transmission or distribution based on specific purpose of the asset.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-37:

For circuit breakers feeding radial facilities at or equivalent to AEP stated transmission voltages (i.e., 34kV and above), please state whether AEP East has facilities at or equivalent to AEP stated transmission voltages (i.e., 34kV and above) that do not have bi-directional flow supplying power to radial loads. If so, does AEP East include these facilities in the ATRR? For each OpCo and TransCo, please provide a detailed list of these facilities, their associated amounts and the FERC Account(s) where these amounts are included.

Response:

The information requested is not maintained by the Company. Please see the Company's response to JI Set 1-36.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-38:

For any Right of Way (“ROW”) being utilized by a distribution line and/or a circuit that has been upgraded or converted to a new transmission line, please identify whether the cost of the ROW is recorded to a distribution or transmission account. In addition, please identify where vegetation management expenses related to clearing the ROW is being recorded (i.e., transmission, distribution function, etc.)

Response:

In cases where right of way (ROW) is being utilized by a distribution line and the circuit gets upgraded or converted to a new transmission line, the existing distribution ROW remains assigned to distribution while any additional ROW costs are assigned to transmission.

Vegetation management costs related to clearing the ROW are typically recorded in FERC utility accounts 356 (Transmission - Overhead Conductors and Devices) or 365 (Distribution - Overhead Conductors and Devices), if eligible for capitalization. Otherwise, vegetation management costs are recorded to the appropriate FERC maintenance account (FERC account 571, Maintenance of Overhead Lines – Transmission or FERC account 593, Maintenance of Overhead Lines - Distribution).

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-39:

Please provide the following related to spares with voltages between 34kV and 755 kV:

- a. Amounts spent on spares by FERC account.
- b. Number of spares purchased in 2017.
- c. Number of spares retired and/or scrapped.
- d. Number of spares placed into service in 2017 and the reason they were required. For anything that was replaced, please provide details of the age and condition.
- e. Identify any spares that were transferred between OpCos and TransCos and their associated amounts by FERC account.

Response:

Please see the below information for spare transformers for 2017.

- a. \$8,353,211.33- FERC account 362 & \$10,285,287.12 FERC account 353
- b. 30.
- c. 26.
- d. 14. These transformers were placed in service to mitigate a failure. The age and condition of the original equipment is not readily available.
- e. No spares were transferred between OpCos and TransCos in 2017.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-40:

In relation to fiber build out for Smart Grid, please provide the following:

- a. A detailed tabulation, including associated amounts, by FERC account of where these expenses are recorded.
- b. How are the expenses determined to be distribution or transmission? What methodologies are used?
- c. What amount of bandwidth is being used to transfer data to transmission control centers versus distribution control centers?

Response:

The Company is unclear what is meant by the term "Smart Grid" and therefore cannot respond to the question as presented.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-41:

In relation to any costs associated with remediation for any environmental or contamination, please provide a detailed list of expenses by FERC account and the nature of the contamination.

Response:

No significant environmental remediation was conducted in 2017 for transmission assets in either the OpCos or TransCos.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-42:

Please provide the following for each 34kV facility in an Excel format with the following columns:

- a. Name of each facility.
- b. Verify whether the transmission control room or distribution control room is operating the facility.
- c. Identify the associated labor cost associated with these facilities by FERC account

Response:

- a. Please see JI 1-42 Attachment 1 for a list of transmission line facilities and Attachment JI 1-42 Attachment 2 for the substation facilities.
- b. The distribution dispatch center operates majority of the facilities listed in Attachment 1 and 2 with few exceptions.
- c. The labor costs associated with these facilities are not separately identified for these assets.

Preparer of Response: Laurie Spears

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-43:

Please provide a detailed breakdown and description of the items by transmission project underlying the amount shown as additions to Transmission Plant in Service in 2017, as reported in the FERC Form 1, Page 206, Line 58, Column (c) separately for:

- a. each OpCo; and
- b. each TransCo (except for AEP Kentucky Transmission Company and AEP West Virginia Transmission Company).

Response:

For items a. and b., please refer to JI-1-043 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-44:

Please identify the following related to major destructive events (i.e., storms, fires, etc.) in 2017:

- a. The FERC Account(s) and corresponding amounts that were recorded related to restoration costs incurred for repair work.
- b. Any pending insurance claims and the amounts associated with anticipated reimbursements from these claims.
- c. The FERC Account(s) where the reimbursements in (b) above will be recorded.
- d. Verify whether OpCo and TransCo self-insures for property insurance by setting aside reserves. If so, please identify what FERC Account these reserves are held.

Response:

There were no costs incurred prior to January 1, 2017 that were included in the OpCos' 2017 ATRR calculations.

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-45:

For the AEP OpCo's only, please provide a detailed breakdown and description of the items underlying the additions to General Plant in 2017, as reported in the FERC Form 1, Page 206, Line 99, Column (c).

Response:

Please refer to JI-1-045 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-46:

Please identify all expenses that were recorded in Transmission O&M or A&G Expense accounts in 2017 that were incurred prior to 2017 and recorded in other O&M expense accounts and state the basis for the change in expense reporting.

Response:

There were no O&M or A&G expenses reported in 2017 that were incurred or reported in other accounts prior to 2017. .

Preparer of Response: Jason Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-47:

Please identify (by FERC Account and amount) all costs included in Transmission, Intangible or General Plant accounts in the 2017 true-up that, prior to 2017, were not recorded to Transmission, Intangible or General Plant accounts. State the reasons for the change in accounting for such costs.

Response:

Refer to JI-1-047 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Christopher Duffy

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-48:

Please state whether any OpCo or TransCo received any revenues from payments made by others for ROW use from or for utility pipelines? If so, provide a detailed breakdown of such payments and reconcile those amounts to 2017 FERC Form 1s and to the revenue credits included in the 2017 true-up for each OpCo or TransCo

Response:

There were four payments made to the OpCo's for ROW use by utility pipelines. These were all recorded in account 4540002. See JI-48 Attachment 1 for details for each, including the OpCo receiving the payment, location and whether it was included in the Transmission or Non-Transmission column on WS E - Revenue Credits. Those items included in the Non-Transmission column were not included as credits to the transmission rate formula.

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-49:

For each OpCo, please explain the derivation of the “Percentage of Plant” figures used to calculate the “Net Plant” in each state jurisdiction as outlined in the tab entitled “Worksheet H Other Taxes.”

Response:

To derive each OpCo's "Percentage of Plant" figures, AEP summed all account balances for General Ledger accounts 101, 103 and 106 by functional FERC Account (see attached JI Set 1-49 Attachment 1 and JI Set 1-49 Attachment 2) for each state in which the OpCo operates. AEP then calculated a percent by state for each functional group, i.e. Distribution, General Plant, Production and Transmission.

Preparer of Response: Diane Keegan

Preparer of Response: Thomas Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-50:

For each OpCo, please identify and provide a detailed breakdown of any Real Estate and Personal Property Taxes which are included in the 2017 FERC Form 1, Page 114, Line 14, Column (c) that were incurred and booked for any generating unit that was retired during 2015, 2016 or 2017

Response:

AEP does not book taxes on a generating plant unit basis in FERC form 1. The OpCo's did incur relatively low-dollar taxes for remaining sites (land and buildings).

For Indiana Michigan Power, Tanners Creek plant was sold in 2016, so \$0 in 2017.

For Kentucky Power, Big Sandy Unit 2 was retired so no taxes were expensed. All remaining Big Sandy taxes are associated with Big Sandy Unit 1.

Kingsport Power has no generation equipment.

Wheeling Power had no retired generation.

Ohio Power had no generation equipment.

For Appalachian Power:

- Glen Lyn plant was \$36,030, primarily real estate.
- Clinch River Unit 3 was \$31,370, primarily real estate.
- Kanawha River was \$1,157,950, of that \$877,550 was incurred from assets-in-service as of 12/31/2014 (plant was still operating), \$280,400 was for the plant post-retirement. The Property Tax expense period lags the taxable assets-in-service by 1½ years.
- Sporn Plant was \$370,040, of that \$225,700 was incurred from assets-in-service as of 12/31/2014 (plant was still operating), \$144,340 was for the plant post-retirement. The Property Tax expense period lags the taxable assets-in-service by 1½ years.

Preparer of Response: Thomas Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-51:

For each OpCo, refer to the 2017 FERC Form 1, Page 205 Line 46, Column (d), please provide a detailed tabulation by retired unit/plant and their associated retirement amounts related to each generation unit/plant.

Response:

Please refer to JI-1-051 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-52:

For each OpCo, please provide an explanation and a detailed tabulation of how the accumulated depreciation, as shown in the 2017 FERC Form 1, Page 219, Lines 20-24, Column (b) was adjusted for each generating unit/plant retired during 2017.

Response:

Please refer to JI-1-052 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-53:

For each OpCo, please verify whether or not Real Estate and Personal Property Taxes continue to be incurred at property locations where generating units or plants were retired during 2015, 2016 or 2017, and if so will these taxes continue to be incurred at the same level after the retirement?

Response:

For each operating company that had retired generation, property taxes will continue to be incurred on all real property associated with the retired unit as long as the OpCo still owns the plant footprint land and any plant buildings that remain intact. These post-retirement taxes will be much less than taxes incurred prior to retirement due to the reduction or elimination of any personal property taxes on in-service equipment. See response to JI Set 1-50.

Preparer of Response: Thomas Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-54:

For each OpCo and TransCo, please provide a 5-year projection of PBOP expenses for 2018 – 2023.

Response:

See the attached table below.

**AMERICAN ELECTRIC
POWER
NON-UMWA POSTRETIREMENT
WELFARE PLAN
NET PERIODIC POSTRETIREMENT
BENEFIT COST**

	2018	2019	2020	2021	2022	2023
Appalachian Power Co.	(\$16,451,990)	(\$16,610,050)	(\$16,767,513)	(\$17,021,601)	(\$17,285,383)	(\$16,270,352)
Indiana Michigan Power Co.	(\$13,579,208)	(\$13,764,632)	(\$13,940,226)	(\$14,195,572)	(\$14,452,251)	(\$13,614,578)
Kentucky Power Co.	(\$3,951,629)	(\$4,002,267)	(\$4,050,837)	(\$4,124,471)	(\$4,198,380)	(\$4,046,025)
Kingsport Power Co.	(\$344,539)	(\$349,401)	(\$355,339)	(\$362,937)	(\$371,026)	(\$350,334)
Ohio Power Co.	(\$11,517,600)	(\$11,654,719)	(\$11,775,617)	(\$11,964,599)	(\$12,161,131)	(\$11,438,383)
Wheeling Power Co.	(\$427,831)	(\$433,172)	(\$437,621)	(\$444,266)	(\$450,988)	(\$423,158)

Preparer of Response: Russell Doyle

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-55:

Please provide a detailed breakout of costs (Excel format), including associates amounts and the cost center where each cost originated, from AEP Service Company (“AEPSC”) that were allocated or directly charged to each OpCo and TransCo by FERC Account. For any amounts allocated to an OpCo or TransCo, please provide the detailed AEPSC entries (Excel format) prior to the allocation to each OpCo and TransCo. For example, please include similar columns with the following types of data (FERC Account Num CMD, Account ID, Account Long Descr, Oper Unit ID, Resp Center ID, Resource Type ID, Process ID, Project ID, Product ID, Journal ID, Business Unit, JD Journal Descr, JD Journal Line Descr, JD Operator ID JD, Vendor Name, Voucher ID JD, Accounting Period CMD, Fiscal Year CMD, Amount, Percentage of Amount allocated to each OpCo/TransCo, OpCo/TransCo Amount) for any account included in the formula.

Response:

Please see JI 1-55 Attachment 1 for detail of AEPSC billings to each OpCo and TransCo for the year 2017. Due to voluminous amount of detail requested, it was not possible to combine all fields requested on one spreadsheet tab, so the attachment is broken up into several tabs to present many of the fields requested.

Preparer of Response: Brian Frantz

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-56:

For the OpCos only, refer to the 2017 FERC Form 1 page 323, Line 193, Account 931 – Rents, please provide a detailed tabulation of every entry booked to this account during 2017, including name, description of cost item and amount.

Response:

See JI 1-56 Attachment 1

Preparer of Response: Jason Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-57:

For each OpCo and TransCo, please refer to the worksheet entitled “WS B-2 – Actual Stmt. AG,” line item entitled “PROV POSS REV REFDS,” please explain the nature of this line item and provide a detailed listing (Excel format) of all items that comprise the balance as of 12/31/2016 and 12/31/2017 by each function (e.g. Generation, Transmission and Distribution).

Response:

For each OpCo and TransCo, on Statement AG in Account 190, for the line item entitled “PROV POSS REV REFDS”, this represents ADIT associated with provisions recorded in Account 229 and/or liabilities recorded in Account 2420514 for various revenue refunds recorded in the general ledger.

Preparer of Response: Michael Kelly

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-58:

For each OpCo and TransCo, please refer to the worksheet entitled “WS F Misc Exp,” and the regulatory commission expenses allocated to the Transmission function, which are specifically listed in the following table. Please respond to the following questions:

- a. Please describe the nature of these expenses and provide the associated FERC docket numbers related to these expenses.
- b. Please provide a detailed listing (Excel format) of all items that are recorded in Account Number 9280005 for each OpCo and TransCo.

Response:

Please refer to JI-58 Attachment 1 (OpCo's) and JI-58 Attachment 2 (TransCo's) for the requested information.

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: Craig Adelman

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-59:

[For APCo,] Please explain and provide a detailed listing (Excel format), including beginning and ending balances, of all items booked to Account 303 - Miscellaneous Intangible Plant, which increased from \$89,738,046 to \$133,572,962 as shown in the 2017 FERC Form 1, Pages 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-059 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-60:

[For APCo,] Please explain and provide supporting documentation for the drivers underlying the increase in Account 353 – Station Equipment from \$1,230,490,509 to \$1,366,357,856 reported in the 2017 FERC Form 1, Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-060 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-61:

[For APCo,] Please explain and provide supporting documentation for the drivers underlying the increase in Account 355 – Poles and Fixtures from \$322,453,464 to \$365,254,244 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 52, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-061 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-62:

[For APCo,] In reference to the 2017 FERC Form 1, Page 256.3, Note 450.2 – Line 26, Column (i), please verify whether there were any short-term advances from AEP Money Pool charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There are no AEP money pool / corporate borrowing program balances for associated interest included on FERC Form 1 page 256.

Preparer of Response: Jason Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-63:

[For APCo,]Please explain and provide supporting documentation for the drivers underlying the increase in Account 560 – Operation Supervision and Engineering from \$8,778,526 to \$10,280,503 as shown in the 2017 FERC Form 1, Page 321, Line 83, Columns (c) and (b), respectively.

Response:

Please see attached file.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-64:

Please explain and provide a detailed listing (Excel format) of all items booked to Account 566 - Miscellaneous Transmission Expenses, which decreased from \$42,434,077 to \$11,535,295 as shown in the 2017 FERC Form 1, Page 321, Line 97, Columns (c) and (b), respectively.

Response:

The main driver for the increase in APCo's Account 566 was the change in recovery of expenses in the Virginia T-RAC. In 2016 APCo was over recovering its expenses vs. an under-recovery position in 2017.

Preparer of Response: Heather Crissinger

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-65:

[For APCo,] Please provide a detailed listing (Excel format) of all items booked to Account 573 - Maintenance of Miscellaneous Transmission Plant in the amount of \$1,032,793 as shown in the 2017 FERC Form 1, Page 321, Line 110, Column (b).

Response:

Please see attached file.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-66:

[For APCo,] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$8,375,381 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please see Pivot Cost Component tab in JI Set 1-66 Attachment 1 for the detailed listing of the activity in Account 923. In addition, please see AEPSC Pivot by Work Order tab for further explanation of the AEPSC activity.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-67:

[For APCo,] Provide all available information supporting the determination of Appalachian's Transmission, Common, General and Intangible Plant depreciation expenses including information showing the application of the depreciation rates to monthly depreciable plant balances for 2017.

Response:

Please see JI1-067 Attachment 1.xls.

Preparer of Response: Jason Cash

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-68:

[For APCo,] In reference to the worksheet entitled “APCo TCOS,” Total Net Plant in Service, Cell L93 has incorrect formula. Please correct the calculation to be the summation of Cells L88:L92.

Response:

Joint Interveners have identified several cells in the templates with either incorrect formulas, or descriptions of calculations that appear to exclude required cells. . AEP has reviewed each formula or reference and determined that the result of the cell complies with tariff on file and changing the cell reference does not impact the revenue requirement or transmission rates. Because the template used for the 2017 true-up will be superseded for the 2018 rate year going forward, it is unnecessary to make the requested changes. However, AEP will review the templates effective for 2018 going forward and make any necessary cell reference corrections.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-69:

[For APCo,]In reference to the worksheet entitled “APCo TCOS,” Settlement Approved PBOP Recovery, Cell E162 for clarity please include Line 2 in the reference.

Response:

See response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-70:

[For APCo,] In reference to the worksheet entitled “APCo TCOS,” Property, Cell E181 has the incorrect reference, please correct the reference to state “Worksheet H ln 24. (C)” as this is the referenced cell in Cell G181.

Response:

This reference is correct as is. It references the total property taxes listed on WS H-1.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-71:

[For APCo,] In reference to the worksheet entitled “APCo TCOS,” Regional Market Expenses, Cell H234 for conformity please have this as a calculation and not an inputted value.

Response:

Please see the response to JI Set 1-68. Making this change will not impact the revenue requirement determined by the formula.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-72:

[For APCo,] Please provide a detailed breakdown of the Generation Step-Up Units on the “APCo WS A – RB Support” tab, Lines 29 and 41 for 2016 and 2017 by year for the following:

- a. Detailed list of GSU Step-Up Units by year;
- b. Detailed list of GSU Step-Up Units transferred from Ohio Power;
- c. Accumulated Depreciation by GSU Step-Up Units by year; and
- d. Accumulated Depreciation by GSU Step-Up Units transferred from Ohio Power.

Response:

Please refer to JI-1-072 Attachment 1 for 2016 data and JI-1-072 Attachment 2 for 2017 data. This data includes units transferred from Ohio Power.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-73:

[For APCo,] In reference to the worksheet entitled “APCo WS B-2 – Actual Stmt. AG,” Row 73 - CAPITALIZED ADVERTISING EXP-TX, please provide a detailed description of what this line item represents, how it relates to the transmission function, and a detailed listing (Excel file) of the items that total the amount of \$1,348,443.60.

Response:

For APCo, the \$1,357,739 amount for Capitalized Advertising - Tax presented in Account 190, Statement AG, functionalized average relates to advertising expenses capitalized for tax purposes related to the Wyoming-Cloverdale 765kv transmission line.

Preparer of Response: Michael Kelly

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-74:

[For APCo,] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “APCo WS E Revenue Credits” tab for Accounts 451, 454, and 456, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “APCo WS E Revenue Credits” tab, Column (k).

Response:

The derivation of transmission-related revenue credits identified on the “APCo WS E Revenue Credits” tab for Accounts 451, 454, and 456, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017 is attached.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-75:

[For APCo,] In reference to the worksheet entitled "APCo WS F Misc Exp", Account 930.1 Total, Cell F59 has incorrect calculation, please correct the calculation to be the summation of Cells F42:F57.

Response:

Please see response to JI-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-76:

[For APCo,] Please provide a detailed listing (Excel format) of all items booked to Account 930.2007 broken out by 100% Non-Transmission and 100% Transmission as shown on the “APCo WS F Misc Exp” tab, Line 42 – 9302007 Assoc Business Development Exp in the amount of \$6,203,004.

Response:

See JI-076 Attachment 1 for a detail listing of activity recorded in 9302007.

Preparer of Response: Diane Keegan

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-77:

[For APCo,] In reference to the worksheet entitled “APCo WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M26:N26, contains reference errors, please correct these errors.

Response:

Please see the response to JI-68. Worksheet J Projected RTEP RR would only be applicable and populated when calculating projected RTEP revenue requirement.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-78:

[For I&M] Please explain and provide a detailed listing including beginning and ending balances (Excel format) of all items booked to Account 303 - Miscellaneous Intangible Plant, which increased from \$86,400,196 to \$146,811,085, or 70%, as shown in the 2017 FERC Form 1, Pages 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-078 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-79:

[For I&M] Please explain and provide supporting documentation for the drivers underlying the 8% increase in Account 355 – Poles and Fixtures from \$163,079,387 to \$176,476,749 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 52, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-079 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-80:

[For I&M] In reference to the 2017 FERC Form 1, Page 256, Note 450.1 – Line 32, Column (i), please verify whether there were any short-term advances from AEP Money Pool charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There are no AEP money pool / corporate borrowing program balances for associated interest included on FERC Form 1 page 256.

Preparer of Response: Jason Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-81:

[For I&M] Please explain and provide supporting documentation for the drivers underlying the 74% decrease in Account 561.2 – Load Dispatch – Monitor and Operate Transmission System from \$1,721,731 to \$444,496 as shown in the 2017 FERC Form 1, Page 321, Line 86, Columns (c) and (b), respectively. If these expenses were transferred to another FERC Account, please provide the justification for the transfer, the FERC Account(s) and associated amounts they were transferred to.

Response:

Please see JI 1-081 Attachment 1 for the requested information.

Preparer of Response: Brian Elswick

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-82:

[For I&M] Please provide a detailed listing (Excel format) of all items booked to Account 566 - Miscellaneous Transmission Expenses of \$1,766,992 in 2017 reported in the 2017 FERC Form 1, Page 321, Line 97, Column (b).

Response:

Please see JI 1-82 Attachment 1 for the requested information.

Preparer of Response: Heather Crissinger

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-83:

[For I&M] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$7,626,203 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please see JI 1-83 Attachment 1 for the requested information.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-84:

[For I&M] In reference to the worksheet entitled "I&M TCOS," Total Net Plant in Service, Cell L93 has an incorrect calculation, please correct the calculation to be the summation of Cells L88:L92.

Response:

Please see the response to JI Set 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-85:

[For I&M] Please confirm on tab entitled "I&M TCOS," PBOP Medicare Subsidy, Cell G152 is incorrectly referencing APCo (=WS O - PBOP!D39) instead of I&M on tab WS O – PBOP, please correct the reference to state =WS O - PBOP!F39.

Response:

Please see the response to JI Set 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-86:

[For I&M] In reference to the worksheet entitled "I&M TCOS," Settlement Approved PBOP Recovery, Cell E162 for clarity please include Line 3 in the reference.

Response:

Please see the response to JI Set 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-87:

[For I&M] In reference to the worksheet entitled "I&M TCOS," Property, Cell E181 has an incorrect reference, please correct the reference to state "Worksheet H ln 24. (C)" as this is the referenced cell in Cell G181.

Response:

Please see the response to JI Set 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-88:

[For I&M] Please provide a detailed breakdown of the Generation Step-Up Units on Worksheet A – RB Support Plant Balances, Lines 29 and 41 for 2016 and 2017 by year for the following:

- a. Detailed list of GSU Step-Up Units by year;
- b. Detailed list of GSU Step-Up Units transferred from Ohio Power (if any);
- c. Accumulated Depreciation by GSU Step-Up Units by year; and
- d. Accumulated Depreciation by GSU Step-Up Units transferred from Ohio Power (if any).

Response:

Please refer to JI-1-088 Attachment 1 for 2016 data and JI-1-088 Attachment 2 for 2017 data.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-89:

[For I&M] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “I & M WS E Revenue Credits” tab for Accounts 451, 454, and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “I & M WS E Revenue Credits” tab, Column (k).

Response:

Attached is the workpaper supporting the transmission-related revenue credits identified on the “I & M WS E Revenue Credits” tab for Accounts 451, 454, and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-90:

[For I&M] In reference to the worksheet entitled "I&M WS F Misc Exp," Account 930.1 Total, Cell F59 has an incorrect calculation, please correct the calculation to be the summation of Cells F42:F55.

Response:

Please see the Company's response to JI 1-068.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-91:

[For I&M] Please provide a detailed listing (Excel format) of all items booked to Account 930.2007 broken out by 100% Non-Transmission and 100% Transmission as shown on the “I & M WS F Misc Exp” tab, Line 41 – 9302007 Assoc Business Development Exp in the amount of \$736,361.

Response:

See JI-91 Attachment 1

Preparer of Response: Diane Keegan

Preparer of Response: Jason Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-92:

[For I&M] In reference to the worksheet entitled “I&M WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M26:N26, contains reference errors, please fix these errors.

Response:

Please see response to JI-68. WS J would only be used when calculating projected RTEP revenue requirement.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-93:

[For I&M] In reference to worksheet “I&M WS M – Cost of Capital,” Line 15 – December Prior to Rate Year, Account 224 – Senior Unsecured Notes, CellF29, please explain and provide supporting documentation for the discrepancy in the value of \$2,007,898,146 compared to the 2017 FERC Form 1, which states \$2,274,166,356.

Response:

In reference to worksheet I&M WSM - Cost of Capital, Line 15 - December prior to Rate Year, Account 224 - Senior Unsecured Notes has been adjusted for long term debt of spent nuclear fuel disposal costs of \$266,268,210, as shown on line 10, 2016 FERC Form 1, pg. 257.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-94:

[For I&M] In reference to worksheet "I&M WS M – Cost of Capital," Line 27 – December of Rate Year, Account 224 – Senior Unsecured Notes, Cell F41, please provide a detailed explanation as to what the adjustment of \$268,585,453 represents.

Response:

In reference to worksheet I&M WS M - Cost of Capital, ln. 27 - December of Rate Year, Account 224 - Senior Unsecured Notes has been adjusted for Long Term Debt Spent Nuclear Fuel Disposal Costs of \$268,585,453, FERC Form 1 2017, pg. 257, line 11.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-95:

[For I&M] In reference to worksheet “I&M WS M – Cost of Capital,” Line 30 – Interest on Long Term Debt – Accts 221 – 224, Column (d), please verify whether this amount includes any short-term interest (e.g. Intercompany Money Pooling etc.), including any short-term interest allocated from the AEPSC. If yes, please provide a detailed listing of the short-term debt and associated amounts.

Response:

There is no short term interest recorded on Line 30 of worksheet M . Short term interest is booked under Account 430 Interest on debt to associated companies.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-96:

[For KPCo] Please explain and provide a detailed listing, including beginning and ending balances (Excel format), of all items booked to Account 303 - Miscellaneous Intangible Plant, which increased from \$19,472,967 to \$28,977,242 as shown in the 2017 FERC Form 1, Pages 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-096 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-97:

[For KPCo] Please provide a detailed listing (Excel format) of all items booked to Account 566 - Miscellaneous Transmission Expenses of \$844,092 in 2017 reported in the 2017 FERC Form 1, Page 321, Line 97, Column (b).

Response:

Please see JI 1-097 Attachment 1 for the requested information.

Preparer of Response: Heather Crissinger

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-98:

[For KPCo] Please provide a detailed listing (Excel format) of all items booked to Account 573 - Maintenance of Miscellaneous Transmission Plant of \$189,288 in 2017 reported in the 2017 FERC Form 1, Page 321, Line 110, Column (b).

Response:

Please see the response in JI 1-98 Attachment 1.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-99:

[For KPCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$1,683,599 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please see JI 1-99 Attachment 1 for the requested information

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-100:

[For KPCo] In reference to the worksheet entitled “KPCo TCOS,” Total of Revenue Requirement for PJM Schedule 12 Facilities, Cell G25, refers to a cell on worksheet “KPCo WS K True-Up RTEP RR which includes reference errors, please correct these errors.

Response:

There are no PJM Schedule 12 Facilities for KPCo, therefore there is nothing to reference on WS K. Please see response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-101:

[For KPCo] In reference to the worksheet entitled “KPCo TCOS,” Total Net Plant in Service, Cell L93 has an incorrect calculation, please correct the calculation to be the summation of Cells L88:L92.

Response:

Please see response to JI 1-068.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-102:

[For KPCo] Please confirm on tab entitled "KPCo TCOS," PBOP Medicare Subsidy, Cell G152 is incorrectly referencing APCo (='WS O - PBOP'!D39) instead of KPCo on tab WS O – PBOP, please correct the cell reference to ='WS O - PBOP'!G39.

Response:

AEP confirms that tab entitled "KPCo TCOS" PBOP Medicare Subsidy, cell 152 is incorrectly referencing APCo, instead of KPCo on tab WS O - PBOP. Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-103:

[For KPCo] In reference to the worksheet entitled “KPCo TCOS,” Settlement Approved PBOP Recovery, Cell E162 for clarity please include Line 4 in the reference.

Response:

Please see the response to JI 1-068.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-104:

[For KPCo] In reference to the worksheet entitled “KPCo TCOS,” Property, Cell E181 has an incorrect reference, please correct the reference to be “Worksheet H ln 24. (C)” as this is the referenced cell in Cell G181.

Response:

Please see the response to JI 1-068.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-105:

[For KPCo] In reference to the worksheet entitled “KPCo TCOS,” Regional Market Expenses, Cell H234 for conformity please change this to a formula and not an inputted value.

Response:

In the FERC Form 1 there are regional market expenses. If there was any labor associated with regional market expense, there would be an inputted value in the formula. See the Company's response to JI 1-068.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-106:

[For KPCo] Please provide a detailed breakdown of the Generation Step-Up Units on the “KPCoWS A – RB Support” Tab, Lines 29 and 41 for 2016 and 2017 by year for the following:

- a. Detailed list of GSU Step-Up Units by year;
- b. Detailed list of GSU Step-Up Units transferred from Ohio Power (if any);
- c. Accumulated Depreciation by GSU Step-Up Units by year; and
- d. Accumulated Depreciation by GSU Step-Up Units transferred from Ohio Power (if any).

Response:

Please refer to JI-1-106 Attachment 1 for 2016 data and JI-1-106 Attachment 2 for 2017 data.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-107:

[For KPCo] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “KPCo WS E Rev Credits” tab for Accounts 451 and 454 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “KPCo WS E Rev Credits” tab, Column (k).

Response:

Please JI 1-107 Attachment 1, for the transmission related revenue credits identified on KPCo WS E Rev Credits tab for Accounts 450, Forfeited Discounts; Account 451, Miscellaneous Service Revenues; Account 454, Rent from Electric Property and Account 456, Other Electric Revenues.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-108:

[For KPCo] In reference to the worksheet entitled “KPCo WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M26:N26 contain reference errors, please correct these errors.

Response:

In reference to worksheet entitled KPCo WS J Projected RTEP RR, there would be no entries nor calculations done on WS J in determination of the actual 2017 KPCo RTEP RR. However, please see JI-68 in reference to the 2017 formula rate true-up.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-109:

[For KPCo] In reference to the worksheet entitled “KPCo WS K True-Up RTEP RR,” Summary of Trued-Up Annual Revenue Requirements for RTEP Projects, Cells N19:O20 contain reference errors, please correct these errors.

Response:

Please see response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-110:

[For KPCo] In reference to worksheet “WS M – Cost of Capital,” Line 30 – Interest on Long Term Debt – Accts 221 – 224, Column (d), please verify whether this amount includes any short-term interest (e.g. Intercompany Money Pooling etc.), including any short-term interest allocated from the AEPSC. If yes, please provide a detailed listing of the short-term debt and associated amounts.

Response:

In reference to worksheet “WS M – Cost of Capital,” Line 30 – Interest on Long Term Debt – Accts 221 – 224, Column there is no short-term interest. Short term interest is booked under Account 430 Interest on debt to associated companies.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-111:

[For KGPCo] Please explain and provide supporting documentation for the drivers underlying the 25% increase in Account 353 – Station Equipment from \$23,204,238 to \$29,023,798 as shown in the 2017 FERC Form 1 Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-111 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-112:

[For KGPCo] In reference to the 2017 FERC Form 1, Page 256, Note 450.1 – Line 7, Column (a), please verify whether there were any short-term advances from AEP Money Pool/Corporate Borrowing Program charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There are no AEP money pool / corporate borrowing program balances for associated interest included on FERC Form 1 page 256.

Preparer of Response: Jason Johnson

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-113:

[For KGPCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$326,030 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please see JI 1-113 Attachment 1 for the requested information.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-114:

[For KGPCo] In reference to the worksheet entitled “KGPCo TCOS,” Total of Revenue Requirement for PJM Schedule 12 Facilities, Cell G25, refers to a cell on worksheet “KGPCo WS K True-Up RTEP RR” which includes reference errors, please correct these errors.

Response:

Please see response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-115:

[For KGPCo] In reference to the worksheet entitled “KGPCo TCOS,” Total Net Plant in Service, Cell L93 has an incorrect calculation, please correct the calculation to equal the summation of Cells L88:L92.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-116:

[For KGPCo] Please confirm on tab entitled “KGPCo TCOS,” PBOP Medicare Subsidy, Cell G152 is correctly referencing APCo (=‘WS O - PBOP’!D39) instead of KGPCo on tab WS O – PBOP, please correct the formula to state =‘WS O - PBOP’!H39

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-117:

[For KGPCo] In reference to the worksheet entitled “KGPCo TCOS,” Settlement Approved PBOP Recovery, Cell E162, for clarification please include Line 5 in the reference.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-118:

[For KGPCo] In reference to the worksheet entitled “KGPCo TCOS,” Property, Cell E181 has an incorrect reference, please correct the reference to be “Worksheet H ln 24. (C)” as this is the referenced cell in Cell G181.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-119:

[For KGPCo] In reference to the worksheet entitled “KGPCo TCOS,” Regional Market Expenses, Cell H234, for conformity please change this to a calculation and not an inputted value.

Response:

Please see the Company's responses to JI 1-105 and JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-120:

[For KGPCo] In reference to the worksheet entitled “KGPCo WS C – Working Capital,” Other Prepayments, Cells K43 and K72, for conformity please change these to calculations and not inputted values.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-121:

[For KGPCo] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “KGPCo WS E Rev Credits” tab for Accounts 454 and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “KGPCo WS E Rev Credits” tab, Column (k).

Response:

See JI 1-121 Attachment 1 for the workpaper supporting the transmission-related revenue credits identified on the “KGPCo WS E Rev Credits” tab for Accounts 454 and 456, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-122:

[For KGPCo] In reference to the worksheet entitled “KGPCo WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M26:N26 contain reference errors, please correct these errors.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-123:

[For OPCo] Please explain and provide a detailed listing, including beginning and ending balances (Excel format), of all items booked to Account 303 - Miscellaneous Intangible Plant, which increased from \$104,719,626 to \$138,197,704 as shown in the 2017 FERC Form 1, Pages 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-123 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-124:

[For OPCo] Please explain and provide supporting documentation for the drivers underlying the 5% increase in Account 353 – Station Equipment from \$1,178,760,672 to \$1,235,092,073 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-124 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-125:

[For OPCo] In reference to the 2017 FERC Form 1, Page 256.2, Line 11 – Groveport Facility Lease, please provide the following:

- a. The FERC Account where this asset is recorded.
- b. The FERC Account where depreciation is recorded.
- c. The FERC Account where the lease payment is recorded.
- d. Whether there are property taxes associated with the lease payment. If so, please identify what FERC Account the property taxes are recorded.

Response:

The Groveport Facility Lease asset is recorded in Account 1011004. Accumulated depreciation is recorded in Account 1011006. The lease payment is recorded in Account 9310001. The property taxes associated with the lease payments are recorded in Account 408103617.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-126:

[For OPCo] In reference to the 2017 FERC Form 1, Page 256.2, Note 450.1 – Line 16, Column (a), please verify whether there were any short-term advances from AEP Money Pool/Corporate Borrowing Program charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There were \$1,693,428 in interest charges recorded to Account 430 for short term advances from the AEP MoneyPool/Corporate Borrowing Program. This amount is not included in line 33.

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-127:

[For OPCo] Please explain and provide supporting documentation for the drivers underlying the 85% decrease in Account 561.2 – Load Dispatch – Monitor and Operate Transmission System from \$4,408,195 to \$676,777 as shown in the 2017 FERC Form 1, Page 321, Line 86, Columns (c) and (b), respectively. If these expenses were transferred to another FERC Account, please provide the justification for the transfer, the FERC Account(s) and associated amounts they were transferred to.

Response:

The primary driver of the reduction in Load Dispatch costs for Ohio Power in 2017 compared to 2016 is a change in labor allocations between Operations & Maintenance (O&M) and Capital costs. In 2016, the O&M/Capital split was approximately 68%/32%. In 2017, the split was approximately 53%/47%. Employees have always charged specific work orders when working more than four consecutive hours on a job. All other time is charged to overheads based on O&M/Capital splits defined for the Transmission Dispatch Centers. In the fourth quarter of 2016 Transmission Operations began capitalizing switching activities that pertained to capital projects. Where applicable, Transmission Operations was directed to charge the specific project if practical, but at a minimum, charge the capital overhead work order of the operating company that owned the asset. This change led to a shift from O&M to Capital of approximately \$3.2M in 2017.

Preparer of Response: Carol Bonham

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-128:

[For OPCo] Please provide a detailed listing (Excel format) of all items booked to Account 566 - Miscellaneous Transmission Expenses of \$(67,083,238) in 2017 reported in the 2017 FERC Form 1, Page 321, Line 97, Column (b).

Response:

See JI 1-128 Attachment 1 for the requested information.

Preparer of Response: Heather Crissinger

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-129:

[For OPCo] Please explain and provide a detailed listing (Excel format) of all items booked to Account 573 - Maintenance of Miscellaneous Transmission Plant, which decreased from \$759,105 to \$220,113 as shown in the 2017 FERC Form 1, Page 321, Line 110, Columns (c) and (b), respectively.

Response:

Please see attached file.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-130:

[For OPCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$7,102,215 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please see JI 1-130 Attachment 1.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-131:

[For OPCo] In reference to the worksheet entitled “OPCo TCOS,” Additional Revenue Requirement, Cell L37 is blank and from the reference in Cell D37 this item should be linked to Worksheet J/K, please correct this error.

Response:

There are currently no Schedule 12 Projects (Worksheet J/K) eligible for incentive ROE. See response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-132:

[For OPCo] In reference to the worksheet entitled “OPCo TCOS,” Total Net Plant in Service, Cell L93 has an incorrect calculation, please correct the calculation to equal the summation of Cells L88:L92.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-133:

[For OPCo] Please confirm on tab entitled “OPCo TCOS,” PBOP Medicare Subsidy, Cell G152 is incorrectly referencing APCo (=‘WS O - PBOP’!D41) instead of OPCo on tab WS O – PBOP, please correct the formula to (=‘WS O - PBOP’!I41).

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-134:

[For OPCo] In reference to the worksheet entitled “OPCo TCOS,” Settlement Approved PBOP Recovery, Cell E162, for clarification please include Line 6 in the reference.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-135:

[For OPCo] In reference to the worksheet entitled “OPCo TCOS,” Property, Cell E181 has an incorrect reference, please correct the reference to state “Worksheet H ln 24. (C)” as this is the referenced cell in Cell G181.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-136:

[For OPCo] In reference to the worksheet entitled “OPCo TCOS,” Regional Market Expenses, Cell H234 for conformity please have this as a calculation and not an inputted value.

Response:

Please see the response to JI-105 in regard to Regional Market Expenses. Also, see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-137:

[For OPCo] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “OPCo WS E Rev Credits” tab for Accounts 451, 454, and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “WS E Rev Credits” tab, Column (k).

Response:

Attached is the derivation and workpaper supporting the transmission-related revenue credits identified on the “OPCo WS E Rev Credits” tab for Accounts 451, 454, and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-138:

[For OPCo] In reference to the worksheet entitled "OPCo WS F Misc Exp", Account 930.1 Total, Cell F60 has an incorrect calculation, please correct the calculation to equal the summation of Cells F43:F56.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-139:

[For OPCo] Please provide a detailed listing (Excel format) of all items booked to Account 930.2007 broken out by 100% Non-Transmission and 100% Transmission as shown on the “OPCo WS F Misc Exp” tab, Line 43 – 9302007 Assoc Business Development Exp in the amount of \$1,374,509.

Response:

See JI-1-139 Attachment 1 for a detailed listing of expenses recorded to 930.2007.

Preparer of Response: Diane Keegan

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-140:

[For OPCo] In reference to the worksheet entitled “OPCo WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M26:N26 contain reference errors, please correct these errors.

Response:

Please refer to the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-141:

[For OPCo] In reference to the worksheet entitled “OPCO WS B-2 – Actual Stmt. AG,” (i) Row 85 - DEFD REV-BONUS LEASE SHORT-TERM and (ii) Row 86 - DEFD REV-BONUS LEASE LONG-TERM, please provide a detailed explanation of what each item represents and the justification for allocating them to the transmission function.

Response:

These accounts include the current and long-term portion of oil and gas bonus lease payments (deferred revenue) which shall be amortized over the length of the lease that have been recorded on the 2530177 and 2530178 accounts for OPCO-Transmission.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-142:

[For WPCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$656,565 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please see JI 1-142 Attachment 1. Please see Pivot Cost Component tab for the detailed listing of the activity in Account 923.

In addition, please see AEPSC Pivot by Work Order tab for further explanation of the AEPSC activity.

Preparer of Response: Sheila Balster

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-143:

[For WPCo] In reference to the worksheet entitled “WPCo TCOS,” Additional Revenue Requirement, Cell L37 is blank and according to the reference in Cell D37 this item should be linked to Worksheet J/K, please correct this error.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-144:

[For WPCo] In reference to the worksheet entitled “WPCo TCOS,” Total Net Plant in Service, Cell L93 has an incorrect calculation, please correct the calculation to equal the summation of Cells L88:L92.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-145:

[For WPCo] In reference to the tab entitled “WPCo TCOS,” PBOP Medicare Subsidy, Cell G152 is incorrectly referencing APCo (=‘WS O - PBOP’!D39) instead of WPCo on tab WS O – PBOP, please correct this formula to equal =‘WS O - PBOP’!J39.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-146:

[For WPCo] In reference to the worksheet entitled “WPCo TCOS,” Settlement Approved PBOP Recovery, Cell E162, for clarification please include Line 7 in the reference.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-147:

[For WPCo] In reference to the worksheet entitled “WPCo TCOS,” Property, Cell E181 has an incorrect reference, please correct the reference to state “Worksheet H ln 24. (C)” as this is the referenced cell in Cell G181.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-148:

[For WPCo] In reference to the worksheet entitled “WPCo TCOS,” Regional Market Expenses, Cell H234 for conformity please have this as a calculation and not an inputted value.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
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**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-149:

[For WPCo] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “WPCo WS E Rev Credits” tab for Accounts 454 and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each Account shown on the “WPCo WS E Rev Credits” tab, Column (k).

Response:

See JI 1-149 Attachment 1 for the derivation and workpaper supporting the transmission-related revenue credits identified on the “WPCo WS E Rev Credits” tab for Accounts 454 and 456 including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-150:

[For WPCo] In reference to the worksheet entitled “WPCo WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M26:N26 contain reference errors, please correct these errors.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-151:

[For WPCo] In reference to worksheet “WS M – Cost of Capital,” Line 30 – Interest on Long Term Debt – Accts 221 – 224, Column (d), please verify whether this amount includes any short-term interest (e.g. Intercompany Money Pooling etc.), including any short-term interest allocated from the AEPSC. If yes, please provide a detailed listing of the short-term debt and associated amounts.

Response:

WS M - Cost of Capital, Line 30 - Interest on Long Term Debt - Acct 221 - 224, Col (d) does not contain any short term interest.

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-152:

[For IM TransCo] Please explain and provide a detailed listing, including beginning and ending balances (Excel format), of all items booked to Account 303 - Miscellaneous Intangible Plant, which increased from \$5,142,116 to \$10,274,641 as shown in the 2017 FERC Form 1, Pages 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-152 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-153:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 51% increase in Account 350 – Land and Land Rights from \$16,938,894 to \$25,638,342 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 48, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-153 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-154:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 230% increase in Account 352 – Structures and Improvements from \$3,428,114 to \$11,301,060 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 49, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-154 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-155:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 46% increase in Account 353 – Station Equipment from \$559,833,974 to \$819,666,519 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-155 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-156:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 212% increase in Account 354 – Towers and Fixtures from \$13,584,521 to \$42,431,289 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 51, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-156 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-157:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 65% increase in Account 355 – Poles and Fixtures from \$183,671,518 to \$303,666,461 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 52, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-157 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-158:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 77% increase in Account 356 – Overhead Conductors and Devices from \$114,928,255 to \$203,412,326 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 53, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-158 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-159:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 100% increase in Account 357 – Underground Conduit from \$0 to \$4,319,004 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 54, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-159 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-160:

[For IM TransCo] Please explain and provide supporting documentation for the drives underlying the 100% increase in Account 358 – Underground Conductors and Devices from \$0 to \$2,210,395 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 55, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-160 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-161:

[For IM TransCo]In reference to the 2017 FERC Form 1, Page 256, Note 450.1 – Line 32, Column (i), please verify whether there were any short-term advances from AEP Money Pool/Corporate Borrowing Program charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There is no interest expense related to AEP MoneyPool/Corporate Borrowing Program included in the FERC Form 1, Page 256.

Preparer of Response: Diane Keegan

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-162:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 503% increase in Account 560 – Operation Supervision and Engineering from \$824,997 to \$4,972,332 as shown in the 2017 FERC Form 1, Page 321, Line 83, Columns (c) and (b), respectively.

Response:

The increase in Operation Supervision and Engineering (Account 560) during 2017 for AEP Indiana Michigan Transmission Company (I&M T-Co) is primarily related to labor and labor-related charges, Shared Services and outside services from AEP affiliates (primarily AEPSC and I&M). The charges are for a variety of support services including business planning and operations, engineering and transmission administration and training. Please note that I&M T-Co's Total Utility Plant increased by over \$540 M (31%) in 2017 over 2016.

Please refer to JI 1-162 Attachment 1 for a summary of the charges to this account from AEP affiliates during 2016 and 2017.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-163:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 51% increase in Account 566 - Miscellaneous Transmission Expenses, from \$893,434 to \$1,351,168 shown in the 2017 FERC Form 1, Page 321, Line 97, Columns (c) and (b), respectively. In addition, please provide a detailed listing (Excel format) of all items booked to this account.

Response:

The increase in Miscellaneous Transmission Expenses (Account 566) for I&M T-Co during 2017 is primarily related to labor and labor-related charges from AEPSC. The AEPSC billings are for a variety of services including corporate initiatives, IT and software support, transmission overheads and NERC compliance expenses. Please refer to JI 1-163 Attachment 1 for a summary listing of the AEPSC 2017 charges to Account 566.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-164:

[For IM TransCo] Please explain and provide supporting documentation for the drivers underlying the 41% increase in Account 920 – Administrative and General Salaries from \$1,832,328 to \$2,575,914 as shown in the 2017 FERC Form 1, Page 323, Line 181, Columns (c) and (b), respectively.

Response:

The \$743K increase in Administrative and General Salaries (Account 920) from 2016 to 2017 for I&M T-Co was primarily due to labor and labor-related charges and Shared Services for services provided by AEPSC. Please note that I&M T-Co's Total Utility Plant increased by over \$540 M (31%) in 2017 over 2016. Please refer to JI 1-164 Attachment 1 for a summary of the 2017 AEPSC charges to Account 920.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-165:

[For IM TransCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$1,212,451 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please refer to JI-165 Attachment 1 for the requested information.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-166:

[For IM TransCo] In reference to the worksheet entitled “I&M Transmission TCOS”, Additional Revenue Requirement, Cell L34 contains a reference error, from the reference in this cell worksheet “I&M Transmission WS J Projected RTEP RR” has an error in Cell O24, please fix the error.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-167:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission TCOS,” Unfunded Reserves, Cells G95 and L95 are blank and according to the reference in Cell E95 the first cell should be linked to Worksheet A and the second cell should be a calculation, please correct these errors.

Response:

There were no Unfunded Reserves recorded in 2017 for I&M Transmission Company. Also, please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-168:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission TCOS,” IPP Contributions for Construction, Cell E108 has an incorrect reference, please correct the reference to state Line 7 as this is the referenced cell in Cell G108.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-169:

[For IM TransCo]In reference to the worksheet entitled "I&M Transmission TCOS," Less transmission plant excluded from PJM Tariff, Cell L203 is blank and according to the reference in Cell D203 the cell should be linked to Worksheet A, please correct this error.

Response:

Please see the Company's response to JI 1-68

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Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-170:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission WS B ADIT & ITC,” Transmission Related Deferrals, Cells E50 and G50 are blank and according to the reference in Cell D50 both cells should be linked to Worksheet B-1, please correct these errors.

Response:

There are no I&M Transmission Related Deferrals - Account 255, however, please see JI 1-68 in reference to any future corrections and/or references.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-171:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission WS F Misc Exp,” Account 930.1 Total, Cell F62 has an incorrect calculation, please correct the calculation to equal the summation of Cells F45:F60.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-172:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M24:N24 contain reference errors, please correct these errors.

Response:

Please note that there would be no I&M Transmission WS J Projected RTEP revenue requirement in the actual 2017 formula. Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-173:

[For IM TransCo] In reference to the worksheet entitled "I&M Transmission WS M – Cost of Capital," Line 32- Amort of Debt Discount & Expense – Acct 428, please explain and provide supporting documentation for the discrepancy between the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$384,583.

Response:

In reference to worksheet entitled "I&M Transmission WS M - Cost of Capital, Ln. 32 - Amort of Debt Discount & Expense Account 428 and Line 34 - Less: Amort of Premium on Debt - Acct 429" the inputted value should match the 2017 FERC Form 1, Ln. 63 and Ln. 64. A correction to this input would increase the 2017 I&M Transmission revenue requirement by \$293,998, if corrected.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-174:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission WS M – Cost of Capital,” Line 34 - Less: Amort of Premium on Debt – Acct 429, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$7,715.

Response:

In reference to the worksheet entitled “I&M Transmission WS M – Cost of Capital,” Line 34 - Less: Amort of Premium on Debt – Acct 429, the correct value shown in the 2017 *FERC Form 1* is \$7,715. Please see the response to JI-173.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-175:

[For IM TransCo]In reference to the worksheet entitled “I&M Transmission WS P Dep. Rates”, Composite Depreciation Rate, Cells C26 and D26, it appears that I&M Transmission is inadvertently using APCo and WPCo’s Composite Depreciation Rate information in this year’s template, please update this information with I&M Transmission depreciation rate information.

Response:

Depreciation expense is the amount booked on I&M Transmission companies FERC Form 1 for 2017 which would be based on the filed and approved depreciation rates for that company. The depreciation rates in the formula are provided for informational purposes, so although the composite depreciation rate information in the 2017 annual update template was not correct for I&M Transmission Company, the depreciation expense recovered in the formula was. Also, please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-176:

[For OH TransCo] Please explain and provide a detailed listing, including beginning and ending balances (Excel format), of all items booked to Account 303 - Miscellaneous Intangible Plant, which increased from \$12,230,800 to \$20,053,051 as shown in the 2017 FERC Form 1, Pages 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-176 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-177:

[For OH TransCo] Please explain and provide supporting documentation for the drivers underlying the 29% increase in Account 350 – Land and Land Rights from \$36,550,146 to \$47,154,411 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 48, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-177 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-178:

[For OH TransCo] Please explain and provide supporting documentation for the drivers underlying the 182% increase in Account 352 – Structures and Improvements from \$7,341,495 to \$20,730,965 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 49, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-178 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-179:

[For OH TransCo] Please explain and provide supporting documentation for the drivers underlying the 20% increase in Account 353 – Station Equipment from \$993,432,413 to \$1,189,237,598 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-179 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-180:

[For OH TransCo] Please explain and provide supporting documentation for the drivers underlying the 30% increase in Account 355 – Poles and Fixtures from \$409,379,648 to \$532,485,308 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 52, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-180 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-181:

[For OH TransCo]In reference to the 2017 FERC Form 1, Page 256, Note 450.1 – Line 31, Column (i), please verify whether there were any short-term advances from AEP Money Pool/Corporate Borrowing Program charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There is no interest expense related to AEP MoneyPool/Corporate Borrowing Program included in the FERC Form 1, Page 256.

Preparer of Response: Diane Keegan

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-182:

[For OH TransCo] Please explain and provide supporting documentation for the drivers underlying the 308% increase in Account 560 – Operation Supervision and Engineering from \$2,191,361 to \$8,937,170 as shown in the 2017 FERC Form 1, Page 321, Line 83, Columns (c) and (b), respectively.

Response:

The increase in Operation Supervision and Engineering (Account 560) during 2017 for AEP Ohio Transmission Company (OH T-Co) is primarily related to labor and labor-related charges, Shared Services and outside services from AEP affiliates (primarily AEPSC and OPCo). The charges are for a variety of support services including business planning and operations, engineering and transmission administration and training. Please note that OH T-Co's Total Utility Plant increased by over \$650 M (22%) in 2017 over 2016. Please refer to JI-182 Attachment 1 for a summary of the AEP affiliate charges to Account 560 for 2016 and 2017.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-183:

[For OH TransCo]Please explain the drivers underlying the 92% increase in Account 566 – Miscellaneous Transmission Expenses from \$2,395,919 to \$4,607,141 as shown in the 2017 FERC Form 1, Page 321, Line 97, Columns (c) and (b), respectively. In addition, please provide a detailed listing (Excel format) of all items recorded to Account 566 - Miscellaneous Transmission Expenses.

Response:

The increase in Miscellaneous Transmission Expenses (Account 566) for OH T-Co during 2017 is primarily related to labor and labor-related charges from AEP affiliates (primarily AEPSC) and an inventory write off. The AEPSC billings are for a variety of services including corporate initiatives, IT and software support, transmission overheads and NERC compliance expenses. Please refer to JI-183 Attachment 1 for a summary listing of the 2017 AEPSC charges to Account 566.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-184:

[For OH TransCo] Please explain and provide supporting documentation for the drivers underlying the 19% increase in Account 920 – Administrative and General Salaries from \$3,871,353 to \$4,603,395 as shown in the 2017 FERC Form 1, Page 323, Line 181, Columns (c) and (b), respectively.

Response:

The \$732K increase in Administrative and General Salaries (Account 920) from 2016 to 2017 for OH T-Co was primarily due to labor and labor-related charges and Shared Services for services provided by AEPSC. Please note that OH T-Co's Total Utility Plant increased by over \$650 M (22%) in 2017 over 2016. Please refer to JI-184 Attachment 1 for a summary of the 2017 AEPSC charges to Account 920.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-185:

[For OH TransCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$1,887,676 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column(b).

Response:

Please refer to JI-185 Attachment 1 for the requested information.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-186:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission TCOS,” Additional Revenue Requirement, Cell L34 contains a reference error, from the reference in this cell worksheet “OH Transmission WS J Projected RTEP RR” has an error in Cell O24, please correct this error.

Response:

Please see the reference to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-187:

[For OH TransCo] In reference to the worksheet entitled “OH Transmission TCOS,” Unfunded Reserves, Cells G95 and L95 are blank and from the reference in Cell E95 the first cell should link to Worksheet A and the second cell should be a calculation, please correct these errors.

Response:

In reference to the worksheet entitled “OH Transmission TCOS,” Unfunded Reserves, there were no 2017 actual unfunded reserves recording on Ohio Power Transmission Co. Also, please see the response to JI 1-68

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-188:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission TCOS,” IPP Contributions for Construction, Cell E108 has an incorrect reference, please correct the reference to state Line 7 as this is the referenced cell in Cell G108.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-189:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission TCOS,” Less transmission plant excluded from PJM Tariff, Cell L203 is blank and from the reference in Cell D203 the cell should be linked to Worksheet A, please correct this error.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-190:

[For OH TransCo] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “OH Transmission WS E Rev Credits” tab for Account 454, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “WS E Rev Credits” tab, Column (k).

Response:

Attached please find workpaper supporting the transmission-related revenue credits identified on the “OH Transmission WS E Rev Credits” tab for Account 454, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Preparer of Response: Jerri-Lynn Ruggiero

Preparer of Response: Craig Adelman

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-191:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission WS F Misc Exp,” Account 930.1 Total, Cell F62 has an incorrect reference, please correct the calculation to equal the summation of Cells F45:F60.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-192:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M24:N24 contain reference errors, please correct these errors.

Response:

In reference to the worksheet entitled “OH Transmission WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M24:N24 there would be no Projected Annual RTEP Revenue Requirements calculated in the Annual True-up formula. Also, please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-193:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission WS M – Cost of Capital,” Average Balance of Long Term Debt, Accounts 223 and 224, Cells E29:F29 and E41:F41 appear to have incorrect FERC Form 1 references, please correct any errors.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-194:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission WS M – Cost of Capital,” Line 32 - Amort of Debt Discount & Expense – Acct 428”, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$518,228.

Response:

The amount input for account 428 should have been \$518,228 along with Acct 429 in the amount of \$10,665. If this were to be corrected, the net effect would be to increase the OH Transmission revenue requirement by \$414,727.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-195:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission WS M – Cost of Capital,” Line 34, Less: Amort of Premium on Debt – Acct 429, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$10,665.

Response:

Please see the response to JI 1-194.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-196:

[For OH TransCo]In reference to the worksheet entitled “OH Transmission WS P Dep. Rates”, Composite Depreciation Rate, Cells C26 and D26, it appears that OH Transmission is inadvertently using APCo and WPCo’s Composite Depreciation Rates information in this year’s template, please update this information with OH Transmission depreciation rate information.

Response:

Depreciation expense is the amount booked on OH Transmission Company's FERC Form 1 for 2017, which would be based on the filed and approved depreciation rates for that company. The depreciation rates in the formula are provided for informational purposes, so although the composite depreciation rate information in the 2017 annual update template was not correct for Ohio Transmission Company, the depreciation expense recovered in the formula was. Also, please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-197:

[For WV TransCo] Please explain and provide supporting documentation for the increase in Account 303 – Miscellaneous Intangible Plant from \$2,976,059 to \$6,120,271 as shown in the 2017 FERC Form 1, Page 204 and 205, Line 4, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-197 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-198:

[For WV TransCo] Please explain and provide supporting documentation for the increase in Account 350 – Land and Land Rights from \$951,572 to \$6,154,658 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 48, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-198 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-199:

[For WV TransCo] Please explain and provide supporting documentation for the increase in Account 352 – Structures and Improvements from \$5,018,546 to \$16,156,517 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 49, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-199 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-200:

[For WV TransCo] Please explain and provide supporting documentation for the 23% increase in Account 353 – Station Equipment from \$375,923,741 to \$461,362,718 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-200 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-201:

[For WV TransCo] Please explain and provide supporting documentation for the 34% increase in Account 354 – Towers and Fixtures from \$84,644,219 to \$113,439,943 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 51, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-201 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-202:

[For WV TransCo] Please explain and provide supporting documentation for the 143% increase in Account 355 – Poles and Fixtures from \$27,729,311 to \$67,248,067 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 52, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-202 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-203:

[For WV TransCo] Please explain and provide supporting documentation for the increase in Account 356 – Overhead Conductors and Devices from \$71,003,427 to \$102,437,593 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 53, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-203 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-204:

[For WV TransCo] Please explain and provide supporting documentation for the increase in Account 358 – Underground Conductors and Devices from \$0 to \$2,798,823 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 55, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-204 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-205:

[For WV TransCo]In reference to the 2017 FERC Form 1, Page 256, Note 450.1 – Line 23, Column (i), please verify whether there were any short-term advances from AEP Money Pool/Corporate Borrowing Program charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There is no interest expense related to AEP MoneyPool/Corporate Borrowing Program included in the FERC Form 1, Page 256.

Preparer of Response: Diane Keegan

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-206:

[For WV TransCo] Please explain and provide supporting documentation for the drivers underlying the increase in Account 560 – Operation Supervision and Engineering from \$439,422 to \$2,796,223 as shown in the 2017 FERC Form 1, Page 321, Line 83, Columns (c) and (b), respectively. In addition, please verify whether any of these expenses were allocated or directly expensed from Ohio Power Company. If so, please provide the associated amounts.

Response:

The increase in Operation Supervision and Engineering (Account 560) during 2017 for AEP West Virginia Transmission Company (WV T-Co) is primarily related to labor and labor-related charges, Shared Services and outside services from AEP affiliates (primarily AEPSC). The charges are for a variety of support services including business planning and operations, engineering and transmission administration. Please note that WV T-Co's Total Utility Plant increased by over \$330 M (48%) in 2017 over 2016. Please refer to JI 1-206 Attachment 1 for a summary of the AEPSC charges to Account 560.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-207:

[For WV TransCo] Please explain and provide supporting documentation for the drivers underlying the 35% increase in Account 920 – Administrative and General Salaries from \$1,081,530 to \$1,465,222 as shown in the 2017 FERC Form 1, Page 323, Line 181, Columns (c) and (b), respectively.

Response:

The \$732K increase in Administrative and General Salaries (Account 920) from 2016 to 2017 for WV T-Co was primarily due to labor and labor-related charges and Shared Services for services provided by AEPSC. Please note that WV T-Co's Total Utility Plant increased by over \$330 M (48%) in 2017 over 2016. Please refer to JI 1-207 Attachment 1 for a summary of the AEPSC charges to Account 920.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-208:

[For WV TransCo] Please provide a detailed listing (Excel format), including detailed descriptions, for Account 923 – Outside Services Employed of \$600,907 in 2017 reported in the 2017 FERC Form 1, Page 323, Line 184, Column (b).

Response:

Please refer to JI 1-208 Attachment 1 for the requested information.

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-209:

[For WV TransCo]In reference to the worksheet entitled “WV Transmission TCOS,” Additional Revenue Requirement, Cell L34 contains a reference error, according to the reference in this cell worksheet “WV Transmission WS J Projected RTEP RR” has an error in Cell O24, please correct this error.

Response:

In reference to the worksheet entitled WV Transmission TCOS, there were no additional projects with incentive ROE's included in the 2017 Actual Revenue Requirement. Also, please see response to JI-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-210:

[For WV TransCo]In reference to the worksheet entitled “WV Transmission TCOS,” IPP Contributions for Construction, Cell E108 has an incorrect reference, please correct the reference to state Line 7 as this is the referenced cell in Cell G108.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-211:

[For WV TransCo]In reference to the worksheet entitled “WV Transmission TCOS,” Less transmission plant excluded from PJM Tariff, Cell L203 is blank and from the reference in Cell D203 the cell should be linked to Worksheet A, please correct this error.

Response:

Please see the response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-212:

[For WV TransCo] Please provide the derivation of and any workpapers supporting the transmission-related revenue credits identified on the “WV Transmission WS E Revenue Credits” tab for Account 454, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017. Also, please explain the derivation of the transmission-related amounts for each account shown on the “WV Transmission WS E Revenue Credits” tab, Column (k).

Response:

Please see JI 1-212 Attachment 1 for the transmission-related revenue credits identified on the “WV Transmission WS E Revenue Credits” tab for Account 454, including a listing of each revenue amount and a description of each total company revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-213:

[For WV TransCo] Refer to the “WV Transmission WS E Rev Credits” tab, Line 5 – Account 456 – Other Electric Revenues, please provide a listing and description of each revenue amount (\$) booked in 2017.

Response:

In reference to the “WV Transmission WS E Rev Credits” tab, Line 5 – Account 456 – Other Electric Revenues, please see attached listing and description of each revenue amount (\$) booked in 2017.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-214:

[For WV TransCo] In reference to the worksheet entitled “WV Transmission WS F Misc Exp,” Account 930.1 Total, Cell F62 has an incorrect calculation, please correct the calculation to equal the summation of Cells F45:F60.

Response:

Please see the response to JI-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-215:

[For WV TransCo] In reference to the worksheet entitled “WV Transmission WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M24:N24 contain reference errors, please correct these errors.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-216:

[For WV TransCo] In reference to the worksheet entitled “WV Transmission WS M – Cost of Capital” Line 32 - Amort of Debt Discount & Expense – Acct 428, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$189,399.

Response:

In reference to the worksheet entitled "WV Transmission WS M - Cost of Capital" Ln. 32 - Amort of Debt Discount & Expense and Account 428 Line 34 - Less: Amort of Premium on Debt Acct were inadvertently excluded from the 2017 formula rate true-up. If corrected for this issue and the one noted in JI 1-217, the 2017 WV Transmission revenue requirement would increase by \$142,296

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-217:

[For WV TransCo]In reference to the worksheet entitled “WV Transmission WS M – Cost of Capital,” Line 34 - Less: Amort of Premium on Debt – Acct 429, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$6,126.

Response:

See response to JI-216.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-218:

[For KY TransCo] Please explain and provide supporting documentation for the drivers underlying the increase in Account 353 – Station Equipment from \$67,095,8411 to \$78,548,704 as shown in the 2017 FERC Form 1, Pages 206 and 207, Line 50, Columns (b) and (g), respectively.

Response:

Please refer to JI-1-218 Attachment 1.

Preparer of Response: David Hummel

Preparer of Response: Thomas Sulhan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-219:

[For KY TransCo]In reference to the 2017 FERC Form 1, Page 256, Note 450.1 – Line 19, Column (i), please verify whether there were any short-term advances from AEP Money Pool/Corporate Borrowing Program charged from AEPSC to Account 430. If so, please provide the associated amounts and whether they were removed from the total on Line 33.

Response:

There is no interest expense related to AEP MoneyPool/Corporate Borrowing Program included in the FERC Form 1, Page 256.

Preparer of Response: Diane Keegan

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-220:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission TCOS,” Additional Revenue Requirement, Cell L34 contains a reference error, according to the reference in this cell worksheet “Kentucky Transmission WS J Projected RTEP RR” has an error in Cell O24, please correct this error.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-221:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission TCOS,” Unfunded Reserves, Cells G95 and L95 are blank and according to the reference in Cell E95 the first cell should be linked to Worksheet A and the second cell should be a calculation, please correct these errors.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-222:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission TCOS,” IPP Contributions for Construction, Cell E108 has an incorrect reference, please correct the reference to state Line 7 as this is the referenced cell in Cell G108.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-223:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission TCOS,” Less transmission plant excluded from PJM Tariff, Cell L203 is blank and according to the reference in Cell D203 the cell should be linked to Worksheet A, please correct this error.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-224:

[For KY TransCo] Refer to the “Kentucky Transmission WS E Rev Credits” tab, Line 5 – Account 456 – Other Electric Revenues, please provide a listing and description of each revenue amount (\$) booked in 2017.

Response:

Please refer to JI-224 Attachment 1 for the requested information.

Preparer of Response: Diane Keegan

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-225:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission WS F Misc Exp,” Account 930.1 Total, Cell F62 has an incorrect calculation, please correct the calculation to equal the summation of Cells F45:F60.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-226:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission WS J Projected RTEP RR,” Summary of Projected Annual RTEP Revenue Requirements, Cells M24:N24 contain reference errors, please correct these errors.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-227:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission WS M – Cost of Capital,” Line 32 - Amort of Debt Discount & Expense – Acct 428, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$22,534.

Response:

In reference to the worksheet entitled “Kentucky Transmission WS M – Cost of Capital,” Line 32 - Amort of Debt Discount & Expense – Acct 428, you are correct the value shown of \$0 is not correct and the correct number should have been the 2017 FERC Form 1 amount of \$22,534. Correcting this error would increase the Kentucky Transmission revenue requirement by \$17,325.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-228:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission WS M – Cost of Capital,” Line 34 - Less: Amort of Premium on Debt – Acct 429, please explain and provide supporting documentation for the value shown of \$0 not correlating to the 2017 FERC Form 1 amount of \$681.

Response:

In reference to the worksheet entitled “Kentucky Transmission WS M – Cost of Capital,” Line 34 - Less: Amort of Premium on Debt – Acct 429, the correct value correlating with the 2017 FERC Form 1 is \$681. Please see the response to JI-227.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-229:

[For KY TransCo]In reference to the worksheet entitled “Kentucky Transmission WS P Dep. Rates,” Composite Depreciation Rate, Cells C26 and D26, it appears that OH Transmission is inadvertently using APCo and WPCo’s Composite Depreciation Rates information in this year’s template, please update this information with Kentucky Transmission depreciation rate information.

Response:

In reference to the worksheet entitled “Kentucky Transmission WS P Dep. Rates,” Composite Depreciation Rate, the correct depreciation expense was used in the calculation of Kentucky Transmission Revenue Requirement. Please see the Company's response in JI 1--68 .

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-230:

[For AP TransCo] In reference to the worksheet entitled "AP Transmission TCOS," Additional Revenue Requirement, Cell L34 contains a reference error, according to the reference in this cell worksheet "AP Transmission WS J Projected RTEP RR" has an error in Cell O24, please correct this error.

Response:

In reference to the worksheet entitled "AP Transmission TCOS" there were no additional actual revenue requirements, Cell L34. However, for reference errors, please see JI-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-231:

[For AP TransCo]In reference to the worksheet entitled “AP Transmission TCOS,” Unfunded Reserves, Cells G95 and L95 are blank and according to the reference in Cell E95 the first cell should be linked to Worksheet A and the second cell should be a calculation, please correct these errors.

Response:

Please JI-68 in reference to the template and correction of cell reference errors.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-232:

[For AP TransCo]In reference to the worksheet entitled “AP Transmission TCOS,” IPP Contributions for Construction, Cell E108 has an incorrect reference, please correct the reference to state Line 7 as this is the referenced cell in Cell G108.

Response:

Please see JI-68 in response to incorrect references.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-233:

[For AP TransCo]In reference to the worksheet entitled "AP Transmission WS B ADIT & ITC," Transmission Related Deferrals, Cells E50 and G50 are blank and according to the reference in Cell D50 both cells should be linked to Worksheet B-1, please correct these errors.

Response:

In response to the worksheet entitled "AP Transmission WS B ADIT & ITC" there are no transmission related deferrals for Account 255. However, please see JI-68 for related reference and correction clean up of the formula rate templates.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-234:

[For AP TransCo] Refer to the “AP Transmission WS E Rev Credits” tab, Line 5 – Account 456 – Other Electric Revenues, please provide a listing and description of each revenue amount (\$) booked in 2017.

Response:

Please refer to JI-234 Attachment 1 for the requested information.

Preparer of Response: Diane Keegan

Preparer of Response: Rhoderick Griffin

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-235:

[For AP TransCo]In reference to the worksheet entitled “AP Transmission WS F Misc Exp,” Account 930.1 Total, Cell F62 has an incorrect calculation, please correct the calculation to equal the summation of Cells F45:F60.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-236:

[For AP TransCo]In reference to the worksheet entitled “AP Transmission WS K True-Up RTEP RR,” Summary of Trued-Up Annual Revenue Requirements for RTEP Projects, Cells N19:O20 contain reference errors, please correct these errors.

Response:

Please see the Company's response to JI 1-68.

Preparer of Response: Diane Keegan

Date: 9/19/2018

**East Joint Interveners (AMP et al) Transmission Formula Update
FERC Docket No ER17-405-000; ER17-406-000**

**Responses to
Set AMP-JI Set 1 of Data Requests**

Data Request JI Set 1-237:

[For AP TransCo]In reference to the worksheet entitled “AP Transmission WS P Dep. Rates,” Composite Depreciation Rate, Cell D26, it appears that AP Transmission is inadvertently using WPCo’s Composite Depreciation Rates information in this year’s template, please update this information with AP Transmission depreciation rate information.

Response:

AP Transmission depreciation expense would be the depreciation expense in the 2017 AP Transmission Company FERC Form 1. However, for informational purposes the Composite Depreciation Rates appear in the templates. You are correct that the AP transmission formula is inadvertently showing WPCo's composite depreciation rates. Please see the response to JI 1-68 for a description of how AEP will address this and similar issues.

Preparer of Response: Diane Keegan

Date: 9/19/2018