

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Terri Maxine Hurley)	
)	
Complainant)	
v.)	Case No. 2025-00058
)	
Kentucky Power Company)	
)	
Defendant)	

MOTION FOR CONFIDENTIAL TREATMENT

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001, Section 13(2), and KRS 61.878(1) for an Order granting confidential treatment to the entirety of:

1. Attachment 1 to the Company’s response to Commission Staff Data Request 2-2 (“KPSC 2-2”);
2. Attachment 2 to KPSC 2-2; and
3. Attachment 1 to the Company’s response Commission Staff Data Request 2-3 (“KPSC 2-3”).

Kentucky Power seeks confidential treatment of information relating to specific customer billing statements. Pursuant to 807 KAR 5:001, Section 13, Kentucky Power is filing under seal those attachments containing confidential information.

I. MOTION FOR CONFIDENTIAL TREATMENT

A. The Request and the Statutory Standard

Kentucky Power does not object to filing the identified information for which it is seeking confidential treatment, but it requests that the identified information be excluded from the public record and public disclosure.

KRS 61.878(1) excludes from the Open Records Act:

(a) Public records containing information of a personal nature where the public disclosure thereof would constitute a clearly unwarranted invasion of personal privacy;

This exception applies to the following information for which Kentucky Power is seeking confidential treatment:

1. **Attachment 1 to KPSC 2-2, Attachment 1 to KPSC 2-3**

Attachments 1 to KPSC 2-2 and Attachment 1 and 2 to KPSC 2-3 include detailed information regarding specific customer billing statements including information about customer usage and payments due. Kentucky Power does not publicly disclose the details of specific customer bills and the public disclosure of such information, including a customer's payment history or lack thereof, would constitute a clearly unwarranted invasion of personal privacy.

Kentucky Power seeks confidential treatment of Attachment 1 to KPSC 2-2 and the entirety of Attachment 1 to KPSC 2-3 indefinitely.

2. **Attachment 2 to KPSC 2-2**

Attachment 2 to KPSC 2-2 is comprised of photographs of the Complainant's residence. Kentucky Power does not publicly disclose information about specific customers including the condition of the property at which the customers take service. Public disclosure of such information would constitute a clearly unwarranted invasion of personal privacy.

Kentucky Power seeks confidential treatment of Attachment 2 to KPSC 2-2 indefinitely.

B. The Identified Information is Generally Recognized as Confidential and Proprietary and Public Disclosure of it Will Constitute a Clearly Unwarranted Invasion of Personal Privacy.

The identified information in Attachments 1 and 2 to KPSC 2-2 and in Attachment 1 to KPSC 2-3 is highly confidential. Dissemination of the information for which confidential treatment is being requested is restricted by Kentucky Power, its parent, AEP, and its affiliates (including American Electric Power Service Corporation). Kentucky Power, AEP, and its affiliates (and third-party vendors where applicable) take all reasonable measures to prevent its disclosure to the public as well as persons within Kentucky Power and third-party vendors who do not have a need for the information. The information is not disclosed to persons outside Kentucky Power, AEP, or its affiliates. Within those organizations, the information is available only on a confidential need-to-know basis that does not extend beyond those employees with a legitimate business need-to-know and act upon the identified information.

C. The Identified Information is Required to be Disclosed to an Agency.

The identified information in Attachments 1 and 2 to KPSC 2-2 and in Attachment 1 to KPSC 2-3 is by the terms of the Commission's orders required to be disclosed to the Commission. The Commission is a "public agency" as that term is defined in KRS 61.870(1). Any filing should be subject to a confidentiality order and any party requesting such information should be required to enter into an appropriate confidentiality agreement.

WHEREFORE, Kentucky Power Company respectfully requests the Commission to enter an Order:

1. According confidential status to and withholding from public inspection indefinitely the entirety of Attachments 1 and 2 to KPSC 2-2 and in Attachment 1 to KPSC 2-3; and

2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,



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COMPANY

Kentucky Power Company
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Commission Staff's Second Set of Data Requests
Dated March 11, 2026

DATA REQUEST

KSPC 2_1 Refer to Kentucky Power's response to the Commission's October 2, 2025 Order and Motion to Dismiss, page 3 regarding Ms. Hurley's actual and estimated usage for the three months at issue. Explain why the number of days in the December 2024 billing cycle was 39 days.

RESPONSE

The 39 day billing cycle for December 2024 was caused by holidays when meters are not read and bills do not issue.

A typical billing cycle ranges from 28 to 32 days, however, in prior years, customers could see longer billing cycles during the months of December and January. To address this concern, the Company worked diligently in 2025 to create a solution that shifts longer billing cycles from winter months when customers often use more power to a shoulder month when less power is historically used.

Witness: Tanner S. Wolfram

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DATA REQUEST

KSPC 2_2 Refer to Kentucky Power’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 4, Confidential Attachment 2.

- a. For each bill identified in Confidential Attachment 2, indicate whether it is an actual or estimated bill.
- b. Explain why meter read dates are included for October 23, 2024, November 21, 2024, and December 30, 2024.
- c. Provide an updated version of Confidential Attachment 2 reflecting the same information for the period from July 2021 to June 2023.
- d. State whether Kentucky Power has investigated or assessed why Complainant’s usage is significantly above the usage of an average residential customer in Kentucky Power’s service territory of about 1,210 kWh per month, and if so, explain the findings of any such investigation or assessment. If not, state whether there is any program available under which Complainant may qualify for an assessment of the drivers of her billed usage and if so, state the basis for allowing the Complainant to participate in the program.

RESPONSE

a. Please see Table TSW-1 which lists whether the bill for each respective month included in KPCO_R_KPSC_1_4_ConfidentialAttachment2 was generated based on an actual or estimated reading.

Table TSW-1

	2023	2024	2025	2026
January		Actual	Actual	Actual
February		Actual	Actual	
March		Actual	Actual	
April		Actual	Actual	
May		Actual	Actual	
June		Actual	Actual	
July	Actual	Estimate	Actual	
August	Actual	Estimate	Actual	
September	Actual	Actual	Actual	
October	Actual	Estimate	Actual	
November	Actual	Estimate	Actual	
December	Actual	Estimate	Actual	

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b. All bills display a meter reading date whether actual or estimated because it identifies the billing date used for that billing cycle and the usage period covered.

c. Please see KPCO_R_KPSC_2_2_ConfidentialAttachment1.

d. Yes, the Company has evaluated why Complainant's usage is significantly above the usage of an average residential customer in Kentucky Power's service territory. The Company has conducted a visual assessment of Ms. Hurley's home based on visual assessment of the property. This assessment was conducted both in person and through the use of the "Street View" function in Google Earth and showed that the home is clearly experiencing energy efficiency challenges. The home does not have a weather-resistant barrier on the outside and appears to lack other measures that would protect the home from air infiltration or heat loss. Please see KPCO_R_KPSC_2_2_ConfidentialAttachment2 which shows images of the property from April 2025 and March 2026.

The Company's DSM vendor, TRC called and emailed Ms. Hurley on February 20, 2026, and then spoke with her on March 16, 2026 to offer a home energy assessment as part of the Home Energy Improvement Program. TRC has not received the required application form necessary for it to move forward with scheduling an assessment. Additionally, there are other income-qualified weatherization programs such as the Targeted Energy Efficiency program which is supplemental to the federally-funded Weatherization Assistance Program that Ms. Hurley may qualify for. These programs are administered by local community action agencies. Kentucky Power cannot contact the community action agency on Ms. Hurley's behalf; Ms. Hurley must contact her local community action agency on her own to determine eligibility and apply.

After the meter replacement and account rebill, a customer services account manager contacted Ms. Hurley on February 10, 2025 to explain the rebill and offered a payment arrangement. Ms. Hurley declined the payment arrangement, stated she would seek legal counsel, and ended the conversation. By ending the conversation, Ms. Hurley prevented further discussion of the potential causes of the higher-than-average usage or energy-efficiency options. After Ms. Hurley filed an informal complaint with the Commission requesting an account adjustment, the representative once again contacted Ms. Hurley on February 13, 2025, explained the adjustment, and again offered a payment arrangement. Ms. Hurley again declined and indicated she would consult an attorney.

Witness: Tanner S. Wolffram

KPCO_R_KPSC_2_2_ConfidentialAttachment1 is redacted in its entirety.

KPCO_R_KPSC_2_2_ConfidentialAttachment2 is redacted in its entirety.

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DATA REQUEST

KSPC 2_3 Refer to Kentucky Power's response Staff's First Request, Item 4 and response to Staff's First Request, Item 1, Confidential Attachment 1. Reconcile the Complainant's account payments for September 2024, October 2024, and December 2024, for the estimated usage with the balance due on the January 2025 billing statement.

RESPONSE

Please see KPCO_R_KPSC_2_3_ConfidentialAttachment1 for the requested information.

Witness: Tanner S. Wolfram

KPCO_R_KPSC_2_3_ConfidentialAttachment1 is redacted in its entirety.

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DATA REQUEST

KSPC 2_4 Refer to Kentucky Power's response to Staff's First Request, Item 6 indicating that "[t]he Company offered to establish a payment arrangement, but Ms. Hurley declined that offer." Explain any payment arrangements that could currently be made available to Complainant for any past due amounts.

RESPONSE

The Company can offer an arrangement to Ms. Hurley with an initial payment of \$1,330.84 which is 25% of the total balance (\$5,323.37). The remaining 75% (\$3,992.53) of the balanced due would be divided into 12 monthly installments of \$332.71. Each installment is added to the regular monthly bill and is due by the bill's normal due date. Alternatively, the Company is willing to extend the installment period to 24 months, reducing the monthly installments to \$166.36. Either of these payment arrangements is based on current total balance as of March 23, 2026 and is subject to change.

Ms. Hurley may also benefit from enrolling in the Average Monthly Payment ("AMP") plan to levelize bills throughout the year on a going forward basis. The estimated AMP balance is \$578 and can be established along with a payment arrangement mentioned above.

Witness: Tanner S. Wolffram

