

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF KENTUCKY	)	
POWER COMPANY TO UPDATE ITS	)	CASE NO.
PURCHASE POWER ADJUSTMENT AND	)	2025-00307
DECOMMISSIONING RIDER RATES AND ITS	)	
SECURITIZED SURCHARGE RIDER	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 5, 2025. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

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

1. Refer generally to Case No. 2023-00159² and Kentucky Power's Decommissioning Rider rates proposed in the instant filing. Explain and provide specific citations for Kentucky Power's understanding that the Decommissioning Rider could be

² Case No. 2023-00159, *Electronic Application of Kentucky Power Company for (1) a General Adjustment of Its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) a Securitization Financing Order; and (5) All Other Required Approvals and Relief* (Ky. PSC Jan 19, 2024).

reinstated to collect amounts not securitized if the securitization was approved and the bonds issued.

2. Refer generally to Case No. 2023-00159³ and Kentucky Power's Decommissioning Rider rates proposed in the instant filing. Explain and provide specific citations for where Kentucky Power informed the Commission that the Decommissioning Rider would be reinstated to collect amounts not securitized, if the securitization was approved and the bonds issued.

3. Refer to Case No. 2023-00159, January 19, 2024 Order, page 64, which states, "If Kentucky Power is unable to issue securitized bonds, collection of the Decommissioning Rider regulatory asset would be reinstated." Explain whether Kentucky Power understands this statement to encompass all Decommissioning Rider amounts.

4. Refer generally to Case No. 2023-00159⁴ and Kentucky Power's Decommissioning Rider rates cover letter in the instant filing, which states, "[Kentucky Power] continued to defer additional Big Sandy Plant retirement costs that were not included within the amounts to be securitized as discussed above, such as costs associated with Legacy Coal Combustion Residuals Rule compliance, to the Decommissioning Rider regulatory asset balance, as the Commission had previously approved." Provide the specific citation of the previous authority to continue to defer these costs after the securitization bonds were issued.

5. Refer to Kentucky Power's Purchased Power Adjustment (Tariff PPA) cover letter and 20250815_KPCo_PPA_2025_Annual_Update.xlsx, Tab Rev Req Variance.

³ Case No. 2023-00159, Jan 19, 2024 Order.

⁴ Case No. 2023-00159, Jan 19, 2024 Order.

Confirm that the \$1,029,116 under-recovery exists because the Commission approved Kentucky Power's proposed rates in Case No. 2023-00318⁵ and those rates that did not include any under or over-recovery.

6. Confirm that no part of the \$1,029,116 under-recovery was included in the amount of the Tariff PPA under-recovery regulatory asset that was securitized. Provide supporting documentation. If not confirmed, explain the response.

7. Provide the current balance of the Tariff PPA under-recovery regulatory asset.

8. Explain how Kentucky Power currently calculates the balance of the Tariff PPA under-recovery regulatory asset.

9. Confirm that Kentucky Power's Tariff PPA is based on a historic test period. If this cannot be confirmed, explain.



Linda C. Bridwell, PE
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DATED **OCT 17 2025**

cc: Parties of Record

⁵ Case No. 2023-00318, *Electronic Tariff Filing of Kentucky Power Company to Update Its Purchase Power Adjustment Rates* (Ky. PSC June 14, 2024).

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