

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
POWER COMPANY FOR A CERTIFICATE OF) CASE NO.
PUBLIC CONVENIENCE AND NECESSITY TO) 2025-00346
CONSTRUCT 46KV TRANSMISSION LINE IN)
FLOYD AND JOHNSON COUNTIES, KENTUCKY)

COMMISSION STAFF'S SECOND 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 February 27, 2026. 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 to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 1 and Item 2, KPCO_R_KPSC_1_2_Attachment1. Refer also to Kentucky Power's Application at page 6, paragraphs 18-20.

a. The responses are incomplete. Mandatory completion differs from the prioritization of, or the timing for, a project. In Attachment 1, there are eight baseline

projects listed for completion in 2025, ten for 2026, and 110 Supplemental projects with no completion date. Explain how Kentucky Power prioritizes the order in which to complete both baseline and supplemental projects approved through the PJM Interconnection, LLC (PJM) Regional Transmission Expansion Plan (RTEP) process.

b. Explain whether PJM supplemental projects, once approved by PJM, are mandatory for the utility to complete.

2. Refer to Kentucky Power's response to Staff's First Request, Item 2 KPCO_R_KPSC_1_2_Attachment1.

a. Of the baseline and supplemental projects listed, explain if all the projects with a Required Date in Column G for the years 2024 and 2025 were completed.

b. Explain whether Kentucky Power anticipates completing all the baseline and supplemental projects listed as required for 2026.

3. Refer to Kentucky Power's response to Staff's First Request, Item 6. Explain why this project's terrain is unique enough to warrant a different evaluation approach than in some past Kentucky Power applications for a Certificate of Public Convenience and Necessity.

4. Refer to Kentucky Power's response to Staff's First Request, Items 9 and 11. Based upon those two responses, provide the expense related to removal of those structures related to this project.

5. Refer to Kentucky Power's response to Staff's First Request, Item 15. The second part of that request was not addressed in the response. Explain how, by segment, the American Electric Power (AEP) Clearance Requirements were applied in this proposed project.

6. Refer to Kentucky Power's response to Staff's First Request, Item 27.
 - a. Explain when Kentucky Power will make a determination regarding whether to maintain or relinquish its rights with respect to existing right-of-way (ROW).
 - b. Explain what criteria Kentucky Power considers when making a determination regarding whether to maintain or relinquish its rights to existing ROW.
 - c. Explain the advantages and disadvantages of maintaining the existing ROW.
 - d. Explain the advantages and disadvantages of relinquishing the existing ROW.
 - e. If Kentucky Power maintains the existing ROW, explain if the ROW will still be cleared and maintained.
 - f. If Kentucky Power maintains the existing ROW, explain the purpose of Kentucky Power choosing to maintain the existing ROW and how it will be utilized.
 - g. If Kentucky Power chooses to relinquish the existing ROW, explain whether Kentucky Power plans to return the existing ROW to its natural state and explain any steps Kentucky Power would take to facilitate returning the existing ROW to its natural state.

7. Refer to Kentucky Power's Application, page 5, paragraphs 14-16, and Exhibit 10. Also refer to the Direct Testimony of Jasmine L. Moore (Moore Direct Testimony), page 3, lines 9-20, and page 4, lines 1-2.

- a. Provide more detail regarding the current physical deterioration and damage that exists on the Prestonsburg-Thelma 46kV circuit.

b. Provide photographic evidence that demonstrates the current physical deterioration and damage that exists on the Prestonsburg-Thelma 46kV circuit.

8. Refer to Kentucky Power's Application, Exhibit 7, Section 3.2, and Kentucky Power's response to Staff's First Request, Item 9.

a. Explain whether Kentucky Power actively monitors its existing ROW to ensure the boundaries of the ROW are respected and maintained.

b. Provide any Kentucky Power policies, procedures, or guidance for monitoring its existing ROW and ensuring its boundaries are not encroached upon.

c. Describe Kentucky Power's process regarding what happens if an encroachment on Kentucky Power's ROW is discovered and how Kentucky Power addresses an encroachment discovered on its ROW.

9. Refer to Kentucky Power's Application, pages 9-10, paragraphs 34-36, and Exhibit 13. Provide a breakdown of specific cost components regarding the \$77 million Alternative 1. Include, at a minimum, in that breakdown: labor, engineering estimates, transmission components by component, materials, land acquisition, and remediation.

10. Refer to Kentucky Power's Application, Exhibit 12, generally. For the four alternative routes considered, as well as utilizing the current transmission line ROW, provide cost estimates for utilizing each route, including the current site, for this project.

 

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DATED **FEB 13 2026**

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