

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) APPROVAL OF	)	
CONTINUATION OF ITS DEMAND-SIDE	)	
MANAGEMENT PROGRAMS; (2) AUTHORITY	)	
TO RECOVER COSTS AND NET LOST	)	CASE NO.
REVENUES, AND TO RECEIVE INCENTIVES	)	2025-00365
ASSOCIATED WITH THE IMPLEMENTATION OF	)	
ITS DEMAND-SIDE MANAGEMENT PROGRAMS;	)	
(3) ACCEPTANCE OF ITS ANNUAL DSM	)	
STATUS REPORT; AND (4) ALL OTHER	)	
REQUIRED APPROVAL AND RELIEF	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO APPALACHIAN CITIZENS' LAW CENTER AND MOUNTAIN ASSOCIATION

Appalachian Citizens' Law Center and Mountain Association (collectively, Joint Intervenors), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 15, 2026. The Commission directs the Joint Intervenors to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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).

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

Joint Intervenors shall make timely amendment to any prior response if Joint Intervenors 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 Joint Intervenors fails or refuses to furnish all or part of the requested information, Joint Intervenors 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, Joint Intervenors 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 the Direct Testimony of Stacy L. Sherwood (Sherwood Direct Testimony) at 13, lines 7-9. That testimony recommended that Kentucky Power take

control of the investment of the Targeted Energy Efficiency (TEE) program funds if the Community Action Agencies continue to “struggle” with overseeing the program. Explain further how Kentucky Power could implement program oversight.

2. Refer to the Sherwood Direct Testimony at 17, lines 6-8. Refer also to page 22, lines 6-9.

a. Provide a recommended threshold of funds that could be rolled over into the next program year that would not cause the concerns expressed in the testimony.

b. Explain whether it would benefit Kentucky Power’s ratepayers to be consistent in future years and prohibit any unspent funds rolling over, or if it is best to allow it under specific circumstances and how those customers may benefit.

3. Refer to the Sherwood Direct Testimony at 22, lines 3-6. Provide the calculation of the recommended surcharge amounts in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

4. Refer to the Sherwood Direct Testimony at 23, lines 6-7. Explain whether the Commission has ever allowed demand-side management (DSM) surcharge funds to be held in an interest bearing account.

5. Refer to the Sherwood Direct Testimony at 23, lines 18-20 and page 24, lines 1-4. Provide examples within Kentucky, or of utilities similar to Kentucky Power, where a utility calculated lost revenues based on assumed savings for measures installed.

6. Refer to the Sherwood Direct Testimony at 22, lines 3-6. Clarify whether a true-up mechanism was employed in the methodology to determine the recommended

DSM rates. If so, provide the specific calculation components used to reconcile previous over- or under-recoveries.

 

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DATED **MAR 27 2026**

cc: Parties of Record

Case No. 2025-00365

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