

DATA REQUEST

KPSC 3_1 Refer to Community Action of Kentucky, Inc.'s (CAK) Response to Staff's First Request for Information, Attachment A, which contains CAK's recommendations for revisions to HEA programs. If the Commission were to implement each recommendation, explain how implementing the recommendation would impact your utility, addressing in detail any perceived benefits, adverse consequences, or impediments to implementing the recommendations.

RESPONSE

1) Demand Side Management (DSM)

CAK recommendation: Flexible use of DSM to reduce the number of deferrals encountered in DOE and LIHEAP funded weatherization programs. For example, a dwelling that has a hole in the roof cannot be weatherized with DOE weatherization funds. If the DSM program could fix the hole, then Federal funds could be used to perform the weatherization services. In the program year 2018/2019, we saw nearly 200 deferrals for 400 homes weatherized.

Kentucky Power response (West): Implementing this recommendation would require Commission approval because it changes the scope of the DSM program and increases the program budget. This in turn would increase the DSM factor. Additionally, moving funds away from weatherization measures toward home repair would decrease the savings assumptions used by the program. These savings assumptions would affect the cost-benefit tests and require a new program evaluation in the near future.

The modification of the program in accordance with the recommendation would decrease the number of deferrals processed by CAK; the number of homes weatherized is likely to remain close to current levels. Kentucky Power's experience indicates the number of completed projects is primarily dependent on the number of weatherization crews local agencies are able to place in the field.

2) Crisis-styled programs providing benefits up to maximum value

CAK recommendation: Develop a more consistent method of calculating the benefit that a ratepayer household can receive. Less than 5% of CAA clients applying for the Wintercare program received benefits from more than one utility provider. Consider reducing the burden of maintaining the pool by moving to a “Individual Utility” based programs instead of a collective fund.

Kentucky Power Response (Cobern): Kentucky Power’s THAW program is classified by CAK as an “Individual Utility” based program. Accordingly, there would be no adverse consequences or impediments to implementing the recommendation.

The Company supports the recommendation that the local community action agencies be afforded the necessary flexibility to shape assistance to best meet each participant’s needs.

3) Enrollment with Recurring Benefits (SLOT)

CAK recommendation:

Client Prioritization

Create a consistent process that prioritizes populations where the small monthly benefits provide the greatest help.

- (i) Focus on prioritizing eligible ratepayers who are impacted by rate increases, and who will benefit from this style of program.
- (ii) Focus on households who have difficulty adjusting to rate increases, spikes in winter and summer utility bills. For example, ratepayers who are on a fixed income, are seniors, have a disability or medical condition, etc.
- (iii) Evaluate modifying eligibility prioritization systems so that they are not weighted to households reporting zero income.
- (iv) Don’t offer the program for those with a significant arrearage, especially if the arrearage is higher than the benefit of the program.
- (v) Provide a mechanism to adjust eligible ratepayer prioritization rules as needed to target the right population

Kentucky Power Response:

- (i) (Cobern) Notwithstanding the fact all customers are impacted by rate increases, Kentucky Power supports review of the criteria for assigning customers to available slots. HEART prioritization is handled by CAK and its member agencies. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation. For further detail regarding the manner in which applicants currently are ranked please see the Company’s response to KPSC 2_2.

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- (ii) (West) Kentucky Power designed HEART to assist customers who are low income and in need of additional assistance. HEART previously offered summer assistance; summer assistance was removed to provide larger, more meaningful assistance during the winter heating months.

Many customers face their highest electric bills during the winter heating months. During 2019, the average customer with electric heating consumed 45% of their annual electric usage during the winter months of December through March. By contrast, the same customers consumed only 29% of their annual usage during the summer cooling months of June through September. Focusing the credits on winter heating months provides customers with assistance when they most require it and also enables the Company to provide larger bill credits, thereby making a bigger impact on the customers' monthly bills when they are most likely to be in need of assistance.

2019 Average Residential Monthly kWh Usage

Month	Electric Heating	Non-Electric Heating
January	2,059	1,257
February	2,044	1,195
March	1,675	1,021
April	1,272	838
May	931	736
June	1,053	910
July	1,243	1,144
August	1,299	1,236
September	1,223	1,139
October	1,056	954
November	1,145	808
December	1,817	1,126
Total	16,817	12,366
Dec - Mar	45.16%	37.20%
Jun-Sept	28.65%	35.82%

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Amendment of the program to provide assistance during the summer cooling months would require the negotiation of an updated agreement with CAK. The modification also would require programming changes, and updated marketing and training materials.

- (iii) (Cobern) Kentucky Power supports working with CAK to develop a more informal and flexible means of adjusting the criteria for ranking participants. Ultimately the Company would want to review and provide final sign off on criteria changes. HEART prioritization is handled by CAK and its member agencies. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation. For further detail regarding the manner in which applicants currently are ranked please see the Company's response to KPSC 2_2.
- (iv) (Cobern) The Company agrees with this recommendation. The HEART program already includes the eligibility requirement that a participant's account be less than 59 days in arrears. Amendment of the Company's program to include different arrearage criteria would require an updated agreement with CAK, programming changes, and updated marketing and training materials.
- (v) (Cobern) Kentucky Power supports working with CAK to develop a more informal and flexible means of adjusting the criteria for ranking participants. Ultimately the Company would want to review and provide final sign off on criteria changes. HEART prioritization is handled by CAK and its member agencies. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation. For further detail regarding the manner in which applicants currently are ranked please see the Company's response to KPSC 2_2.

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CAK recommendation:

Eliminate the recertification concept

The administrative effort of “recertifying” a client is equivalent to the effort involved in enrolling or re-enrolling the client. This is due to the time that elapses during which a ratepayer’s circumstances may change for the better or for the worse, necessitating a review of the applicant’s circumstances tantamount to enrollment.

Instead of using the “recertification” concept for prior participants, at the end of the program year, we recommend dropping the waitlist and performing re-enrollment.

Kentucky Power Response (Cobern): The Company agrees with this recommendation; the HEART program already requires customers to enroll annually. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation. For further detail regarding the importance of requiring re-enrollment please see Kentucky Power’s response to KPSC 2_6.

CAK recommendation:

Timeframe

- (i) Map the enrollment period to the LIHEAP Subsidy enrollment period, including pre-enrollment (usually in October).
- (ii) Map the benefit period to the LIHEAP Subsidy enrollment months to eliminate discrimination of ratepayers based on their last name. For example, LIHEAP subsidy applicants are taken in order by last name. If people whose last name falls at the end of the alphabet aren’t able to apply until after the first benefits are applied, then they will receive one less month of benefit.

Kentucky Power Response (Cobern):

- (i) No change required. The enrollment period for HEART follows the LIHEAP Subsidy enrollment period. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation.
- (ii) No change required. The enrollment period for HEART allows sufficient time to process applications to permit customers whose last name falls at the end of the alphabet to receive their first benefit. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation.

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CAK recommendation:

Client Credits

- (i) CAAs should provide the utility with the client(s) to be placed in the slots one time. That client should remain enrolled until the end of the program year or their participation is terminated. CAAs should not have to send the same list to the utility every month as this increases administration costs.
- (ii) The utility should be responsible for determining and applying the amount of the credit to the client's account each month. The CAA should not have to determine the dollar credit amount and notify the utility of the credit amount each month. Rather, the CAA should send the enrollment requisite information to the utility thereby allowing the utility to determine the dollar credit amount.

Kentucky Power Response (Cobern):

- (i) CAAs currently provide each customer's name once to Kentucky Power. The customer then remains on HEART throughout the program year unless their participation is terminated. As such, there would be no adverse consequences or impediments to the Company in implementing the recommendation.
- (ii) The Company does not see a benefit to implementing this change. The change would simply change the type of data to be provided by CAAs by replacing the credit amount with the energy type. Providing the energy type in lieu of the dollar amount would require additional programming by Kentucky Power to link the participant with their appropriate credit amount.

Overall Recommendations

CAK recommendation:

a) Drop the Weatherization ("WX") application requirement. The WX application pools are usually at maximum capacity, so that additional eligible clients are unlikely to be served. The WX application process is lengthy and increases administrative burden on CAAs and on the eligible clients.

The DOE weatherization rules disqualify some clients from receiving weatherization services making this application requirement wasteful and potentially discriminatory. For example, the DOE weatherization rules prohibit the weatherization of dwellings if they have been weatherized since 1994. Forcing a client who is readily excluded from weatherization program eligibility to nonetheless apply for such a program results in a significant waste of time and resources for both the client and CAAs.

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Clients should be referred to the WX programs and encouraged to sign up, but not required to do so.

Kentucky Power Response (West): Kentucky Power and CAK met in May 2019 to discuss the performance and operation of HEART and THAW. Kentucky Power and CAK agreed this requirement was inefficient and also interfered with the operation of the weatherization programs. Accordingly, the removal of this requirement was identified in Case No. 2019-00245 and approved by Commission Order dated September 11, 2019.

CAK recommendation:

b) Drop the budget plan enrollment requirement. Clients will often not apply for HEA programs if there is a requirement to participate in the budget plan program. It is reported that utilities demand a “balloon” payment at the end of the year to capture any underpayment. Clients report that they cannot absorb this unexpectedly large payment, so they will avoid enrolling in the budget plan program. Also, some clients indicate that the budget plan affects other benefits. It may be possible to retain this requirement if the balloon payment is resolved and the budget plan does not conflict with assistance.

Kentucky Power Response (Cobern): The Company agrees with this recommendation. The Company's HEART program was amended in Case No. 2019-00245 to remove the requirement that participants enroll in the Company's AMP plan. For further detail for the basis for the change please see the Company's response to KPSC 3_4.

CAK recommendation:

c) Implement consistent eligibility requirements:

- (i) For Crisis-styled programs, define “hardship”, use a consistent income guideline, etc.
- (ii) For recurring payment programs, use a consistent method to determine the fixed monthly benefits. Same eligibility (follow LIHEAP).
- (iii) For donation programs, align the regulation so that the “donation” funded programs follow the LIHEAP income guidelines.
Example: Columbia Gas is set to 115% (want to follow LIHEAP, but requires re-filing)

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Kentucky Power Response (Cobern):

- (i) The Company's THAW program currently defines a hardship as: "an event that has caused a significant burden on the household. As such THAW funds could provide a noticeable and meaningful contribution for the participant to cope with the resulting financial strain of such burden(s)."

The inclusion of consistent income guidelines for THAW would be counterproductive. The THAW program is designed to mitigate the impact of short-term crises or financial hardships. The lack of a formal income requirement allows local community action agencies to evaluate the nature of an applicant's hardship and determine the level of support to be provided (up to a maximum of \$175). This flexibility allows the CAAs to tailor assistance to meet individualized needs, including by providing assistance to customers who may benefit from more limited assistance than provided by HEART.

The imposition of income guidelines would require the Company to seek an updated agreement with CAK and update marketing and training materials. No programming changes would be required as income verification is performed by the CAAs.

- (ii) The Company interprets the proposal to require each investor owned utility recurring payment program to have the same dollar credit amount. This recommendation disregards the uniqueness of each Company and its customer base, including rates, level of funding, and customer income level.

Adoption of a uniform credit amount would require the Company to seek an updated agreement with CAK and update marketing and training materials. No programming changes would be required.

- (iii) The Company agrees with updating the statute to align "donation" funded programs to follow the LIHEAP income guidelines.

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CAK recommendation:

d) Consistent benefits: Develop and implement a consistent method of determining the benefit amounts so that clients receive an equitable amount across energy types, and across programs. At this time we cannot identify any logic behind how the benefit amounts are determined.

Kentucky Power Response (West): This recommendation disregards the uniqueness of each Company and its customer base, including company rates, customer income level, and average bill size. These factors affect what credit amount will provide meaningful benefit.

Furthermore, the variance in benefit amount between energy types (heating vs non-heating) is intended to ensure equitable benefits. Approximately 63% of the Company's approximately 133,800 residential customers use electricity as their primary source of heat; approximately 37% of Kentucky Power's customers have non-electric heat. Customers who use electricity as their primary source of heat typically have higher electric bills, particularly during the winter heating season, than those who do not. This is illustrated in the below table. Because of this fact, and the importance of maintaining heat during the winter heating season, Kentucky Power allocates 85 percent of each local community action agency's available funds to households using electricity to provide their primary source of heat.

Estimated Residential Monthly Bill

Month	Electric Heating	Non-Electric Heating
January 2019	\$ 250.66	\$ 159.94
February 2019	\$ 226.14	\$ 139.51
March 2019	\$ 191.08	\$ 123.36
April 2019	\$ 149.13	\$ 104.43
Total Winter Estimated Bill	\$ 817.02	\$ 527.24

Adoption of uniform benefit amounts would require the Company to seek an updated agreement with CAK and update marketing and training materials. No programming changes would be required.

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CAK recommendation:

e) Drop the requirement to direct the LIHEAP payments to the utility. This requirement negatively impacts clients who may heat with propane, or other fuels. For example: The client may need the help from LIHEAP subsidy to fill their propane tank, but that would make them ineligible for receiving HEA assistance with their electricity. (KY Power and KU HEA have these requirements.)

Kentucky Power Response (Cobern): The Company's HEART program was amended in Case No. 2019-00245 for recipients to direct LIHEAP payments to Kentucky Power only if electricity is their primary heating source. Previously, all customers were required to direct LIHEAP payments to Kentucky Power. Retention of the requirement in the case of customers whose primary heating source is electricity ensures a large balance is not accumulated thereby reducing the risk of disconnection.

Adoption of the recommendation would result in no adverse consequences or impediments for the Company.

CAK recommendation:

f) Drop the requirement to apply for LIHEAP. There are periods of time where LIHEAP may not be available, and the client would therefore be ineligible. For example, the weeks between the end of LIHEAP Subsidy enrollment and the start of LIHEAP crisis. Also, during winter months, LIHEAP crisis funds may be depleted, preventing the client from applying.

Kentucky Power Response (Cobern): Please see the Company's response to KPSC 2_4 for the benefits of keeping the requirement of applying to LIHEAP. That being said, the Company understands the issues raised by CAK. Instead of removing the requirement, the option of amended requirement language may achieve the same goal. For example, the Company's current requirement states: "Be enrolled in a LIHEAP program..." which could be amended to read: "Be enrolled in a LIHEAP program if any such program is available to the applicant..."

Adoption of this recommendation would require the Company to seek an updated agreement with CAK and update marketing and training materials. No programming changes would be required.

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CAK recommendation:

g) Administrative recommendations

- Streamlined consistent deliverables. Reporting periods, the data in the reports should be consistent across programs. Variations in reporting from program to program results in the productions and maintenance of many sets of reports, each to meet an individual utility contract.
- Create and use standardized contract templates across programs to reduce administration costs associated with developing and negotiating a unique contract for each program. Also develop consistent, templated disclaimers, waiver language, informed consent, and other documents. This will reduce legal fees and administrative burdens.
- Include legal fees as required to meet regulatory compliance – such as compliance with local, state and federal data security and privacy requirements or concerns. For example, contracts should address data sharing agreements, and HEA clients should be provided with privacy policies. (This is not intended to pay for litigation expenses.)
- Standardize Invoices and Invoicing procedures to reduce burden.
- Fees paid to organizations for processing applications should be consistent across programs when the burden and work is equal.
- Implement a mechanism to pay for ongoing maintenance of IT and computer systems. These systems require set up fees at the beginning of the program, but also ongoing maintenance, updates, etc.
- Implement a mechanism to pay for support of the system. Users will have questions regarding the system, file transfers may fail, equipment failures etc.

Kentucky Power Response (West): Absent specific proposals it is not possible to respond individually to these seven recommendations. Kentucky Power anticipates there may be an opportunity to achieve greater uniformity in procedures and forms. As evidenced by the program modifications presented to the Commission in Case No. 2019-00245, Kentucky Power is willing to modify existing procedures where appropriate. Nevertheless, internal controls and other regulatory requirements are likely to vary among those utilities contracting with CAK so that complete uniformity is not possible.

More problematic are the proposals to use additional program funds to cover administrative expenses. The diversion of additional program funds to cover CAK's administrative expenses will further limit the number of customers who can be assisted. The current percentage caps on administrative expenses provide CAK with a reasonable means of meeting its program-related administrative expenses.

Witness(es): Stevi N. Cobern
Brian K. West

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KPSC 3_2 Identify any other bill payment assistance programs, other than those listed on the attached spreadsheet, that your utility funds either through customer donations or shareholder funds. Describe all funding sources for the program(s); state whether the program is a crisis program or recurring benefit program, provide the eligibility criteria; and state whether any fees are paid to administer the program(s).

RESPONSE

The Company does not have any other bill payment assistance programs funded by either customer donations or shareholder funds.

Witness: Brian K. West

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KPSC 3_3 Explain whether HEA benefits are prioritized or provided before or after other available benefits, such as LIHEAP, donations or other programs aimed at reducing consumers' energy burdens.

RESPONSE

Kentucky Power's HEART and THAW programs are designed to work in tandem with LIHEAP and LIHEAP crisis with benefits often provided concurrently. HEA benefits thus are not prioritized or provided before or after other available benefits, such as LIHEAP, donations or other programs aimed at reducing consumers' energy burdens.

Witness: Stevi N. Cobern

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DATA REQUEST

KPSC 3_4 Refer to Attachment 1, page 3 of 5, to Kentucky Power's response to Staff's Second Request for Information, Item 3. Explain the difference and disparity between the "allocated" and "used" totals for the separate community action agencies. For example, Gateway and LKLP used all, or nearly all, of their allocated slots while Big Sandy has used less than 25 percent of their allocated slots.

RESPONSE

The difference between the "allocated" and "used" totals for the separate community action agencies is due to the number of eligible households which applied for the program within their service area. Participation is outside the Company's control; however, knowing that participation levels were low in the 2018-2019 program year Kentucky Power and CAK met in May 2019 to discuss the performance and operation of HEART and THAW, particularly in light of the significant changes which had occurred from Case No. 2018-00311. These discussions also addressed modifications to increase applications by eligible households. This meeting identified several modifications to the program that in turn were proposed in Case No. 2019-00245. These modifications were approved by the Commission on September 11, 2019.

The Company wants to ensure that the HEART and THAW programs are a positive experience for customers. While the AMP program is and can be a real benefit for many of Kentucky Power's customers, making participation in the HEART program a requirement was counterproductive. The CAAs reported that many otherwise eligible customers elected not to enroll in the HEART program due to this new requirement. It is Kentucky Power's understanding these HEART applicants indicated they were uncomfortable with the requirement and chose not to proceed. Additionally, according to the CAAs, a high percentage of HEART applicants are on a fixed income. As such, AMP is unlikely to help these customers transition from the HEART program. The funds available to many fixed income customers to pay their electricity bill remain constant throughout the year and a bill management tool such as AMP, many times is insufficient to address the underlying issue. Yet, many of these customers will benefit from continued support through the HEART program. To ensure applicants who might benefit from participation in AMP and other Company payment plans information is communicated via CAA agents and an informational leaflet. For an example of this leaflet, please see KPCO_R_KPSC_3_4_Attachment1. Importantly, this provides HEART applicants with the ability to meet with a CAA agent who can guide the customer through the various

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options, the benefits that each payment plan offers, and an explanation of what to expect should the customer enroll.

Based on these changes and other efforts, participation in the Company's HEART program increased during the 2019-2020 program year. Based on the most recent report from CAK, 95% of HEART electric slots (1,582 of 1,661 available) and HEART non-electric slots (552 of 579 available) have been filled.

Witness: Brian K. West

WE CAN HELP YOU TAKE CONTROL OF YOUR BILLS

Kentucky Power customer service representatives are ready to help you and can be reached at 1-800-572-1113.

RECEIVE AN UNEXPECTED BILL THIS MONTH?

If you have medical issues, call us and we'll explain how to get a medical extension.

Learn about our [Payment Assistance programs](#) including our programs to provide assistance to low-income customers.

We offer various payment plans to help manage bills:

Set up an [Extended Payment Agreement](#) to divide a larger bill into installments and pay over several months.

Enroll in the [Average Monthly Payment \(AMP\) plan](#), which allows for a rolling 12-month average bill to even out winter heating and summer cooling bill spikes. Your monthly AMP is determined by averaging the actual amount of your current bill plus your 11 previous monthly bills. Every month, the oldest of the 11 previous bills is removed from the calculation, and your new current bill is included. This is why the AMP amount will vary slightly from month to month. However, these fluctuations should be less than the variations you would see paying your actual bill each month.

Enroll in [Budget billing](#) to even out winter heating and summer cooling bills. Budget billing allows you to pay a set bill amount each month based on the 12-month average. This amount is reviewed throughout the year and can be adjusted if needed. At the end of 12 months you settle up the account by either paying any remaining balance due or receiving a credit balance. Budget billing can only be established April through December.

To sign up for any of these programs, log into your account on our website, or by calling us at 1-800-572-1113.

WANT TO REDUCE ELECTRICITY USAGE?

Learn [energy saving tips](#) by visiting kentuckypower.com/save

Call our partner, Community Action of Kentucky, at 1-800-456-3452 to learn about our home weatherization program for low-income families. Energy audits, consultation, and extensive weatherization and energy conservation measures will be provided to eligible low-income customers. Low-income customers who use an average of 700 kWh per month are eligible for the program. Our partner, Christian Appalachian Project, also can assist low-income seniors in Floyd, Johnson, Knott and Martin counties. Call 1-866-270-4227 for assistance.

SIGN UP FOR BILLING ALERTS.

If you received a disconnect notice because you forgot to make a payment, consider being alerted when bills are due. You can sign up to have the payment automatically withdrawn from your bank account.

Help a family member or friend avoid a service disconnection in the future with the Third-Party Notification Program. The account holder can sign you up to receive copies of the billings if service is at risk for nonpayment. Go to kentuckypower.com/account/bills/assistance or call us at 1-800-562-1113.

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- KPSC 3_5** For each HEA program, provide the following information for each of the last five full program years:
- a. The average monthly bill for all residential customers for each month from November to March.
 - b. The average monthly bill for residential customers receiving HEA benefits for each month from November to March.
 - c. The average monthly bill for residential customers receiving LIHEAP benefits for each month from November to March.

RESPONSE

a.b.c. The requested information is only readily available for the past 36 months due to the archiving of data older than 36 months. Accordingly, providing the data past this timeframe would be resource intensive and cannot be accessed in time to answer this request. Please see the table below for the requested information for the period November 2017 through December 2019.

Average Monthly Bill

Year	Month*	All Residential	HEART	THAW	LIHEAP	LIHEAP CRISIS
2019	December	177.55	213.35	N/A	224.43	N/A
2019	November	123.88	N/A	N/A	146.95	N/A
2019	March	163.67	187.37	224.11	158.66	194.54
2019	February	192.18	222.58	See below	292.27	242.37
2019	January	214.52	240.97	See below	256.18	287.56
2018	December	180.09	N/A	N/A	225.03	N/A
2018	November	126.64	N/A	N/A	151.93	N/A
2018	March	152.73	163.14	N/A	192.64	N/A
2018	February	213.78	211.58	N/A	266.86	274.41
2018	January	260.55	269.56	N/A	393.18	354.12
2017	December	188.34	226.8	N/A	244.99	N/A
2017	November	123.93	N/A	N/A	152.89	N/A

* Calendar Month, not Billing Month

N/A represents months where a program was inactive or funds had been fully expended prior to the month's start.

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Information is not available for January 2019 and February 2019 THAW participants. The Company was unable to credit the accounts of customers receiving a THAW award for use in January 2019 and February 2019. To ensure no customers were erroneously disconnected the Company manually monitored accounts with a THAW pledge and placed extensions on these accounts in the THAW pledge amount.

Witness: Brian K. West

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DATA REQUEST

- KPSC 3_6** Refer to Appendix C of the Commission's Order in Case No. 2019-00366 dated October 28, 2019. For the period of January 1, 2015, until December 31 , 2019, provide (monthly and annually) the following information:
- a. Total service termination notices issued.
 - b. Total service terminations.
 - c. Total amount of unique customers issued service termination notices.
 - d. Total amount of unique customers with service terminated.

RESPONSE

a.b.c.d. The requested information is only readily available for the past 36 months due to the archiving of data older than 36 months. Accordingly, providing the data past this timeframe would be resource intensive and cannot be accessed in time to answer this request. Please see the below tables for the requested information.

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By Month

Year	Month*	HEART		THAW	
		Termination Notices	Service Terminations	Termination Notices	Service Terminations
2019	December	25	N/A	N/A	N/A
2019	November	N/A	N/A	N/A	N/A
2019	October	N/A	N/A	N/A	N/A
2019	September	N/A	N/A	N/A	N/A
2019	August	N/A	N/A	N/A	N/A
2019	July	N/A	N/A	N/A	N/A
2019	June	N/A	N/A	N/A	N/A
2019	May	N/A	N/A	N/A	N/A
2019	April	224	12	184	19
2019	March	230	3	273	4
2019	February	230	4	See below	See below
2019	January	113	1	See below	See below
2018	December	N/A	N/A	N/A	N/A
2018	November	N/A	N/A	N/A	N/A
2018	October	N/A	N/A	N/A	N/A
2018	September	242	7	N/A	N/A
2018	August	384	16	N/A	N/A
2018	July	383	17	N/A	N/A
2018	June	83	N/A	N/A	N/A
2018	May	N/A	N/A	N/A	N/A
2018	April	N/A	N/A	N/A	N/A
2018	March	310	2	N/A	N/A
2018	February	286	3	N/A	N/A
2018	January	242	4	N/A	N/A
2017	December	72	0	N/A	N/A
2017	November	N/A	N/A	N/A	N/A
2017	October	N/A	N/A	N/A	N/A
2017	September	202	4	N/A	N/A
2017	August	269	12	N/A	N/A
2017	July	225	14	N/A	N/A
2017	June	47	N/A	N/A	N/A
2017	May	N/A	N/A	N/A	N/A
2017	April	N/A	N/A	N/A	N/A
2017	March	358	13	N/A	N/A
2017	February	324	4	N/A	N/A
2017	January	341	8	N/A	N/A

* Calendar Month, not Billing Month

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Except for a few extraordinary circumstances, a customer receives a termination notice only once each monthly billing cycle. The number of unique monthly termination notices and total monthly termination notices thus are equal. Similarly, because service can be terminated only following the issuance of a termination notice, the total number of monthly service terminations and unique monthly service terminations are equal.

By Year

	HEART				THAW			
	Termination Notices	Service Terminations	Unique Termination Notices	Unique Service Terminations	Termination Notices	Service Terminations	Unique Termination Notices	Unique Service Terminations
2019	822	20	412	20	457	23	457	23
2018	1,930	49	814	44	N/A	N/A	N/A	N/A
2017	1,838	55	598	49	N/A	N/A	N/A	N/A

N/A represents months where a program is inactive or funds had been fully expended prior to the month's start.

Information is not available for January 2019 and February 2019 THAW participants. The Company was unable to credit the accounts of customers receiving a THAW award for use in January 2019 and February 2019. To ensure no customers were erroneously disconnected the Company manually monitored accounts with a THAW pledge and placed extensions on these accounts in the THAW pledge amount.

Witness: Stevi N. Cobern

VERIFICATION

The undersigned, Stevi N. Cobern, being duly sworn, deposes and says she is a Customer Services Coordinator Associate for Kentucky Power, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

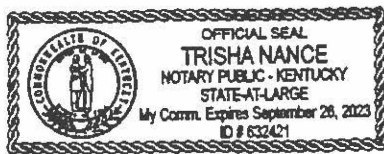
Stevi N. Cobern
Stevi N. Cobern

Commonwealth of Kentucky)	
)	Case No. 2019-00366
County of Boyd)	

Subscribed and sworn before me, a Notary Public, by Stevi N. Cobern this 13th day of February, 2020.

Trisha Nance
Notary Public

My Commission Expires 9-26-2023



VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.



Brian K. West

Commonwealth of Kentucky)
)
County of Boyd) Case No. 2019-00366

Subscribed and sworn before me, a Notary Public, by Brian K. West this
13th day of February, 2020.



Notary Public

My Commission Expires 9-26-2023

