

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Emergency Docket Related)	Case No.
To The Novel Coronavirus COVID-19)	2020-00085

**REQUEST OF KENTUCKY POWER COMPANY TO DEVIATE FROM LATE
PAYMENT CHARGE TARIFF REQUIREMENTS**

On March 16, 2020, the Public Service Commission of Kentucky (“Commission”) initiated these proceedings to address pressing issues related to utility service across the Commonwealth as a result of the novel coronavirus COV-19. The Commission directed utilities to use any flexibility under their tariffs to discontinue disconnections for non-payment and to stop collecting, or extend the payment of, late payment charges until otherwise ordered by the Commission.¹ The Commission further directed that if a utility lacks the required flexibility under its tariff to stop collecting or to extend payment of late payment fees, it should file a request to the Commission to do so in this docket.²

Kentucky Power Company commends the Commission’s swift action to protect customers and has immediately acted to implement the Commission’s directives in order to minimize hardship to customers during this time. Kentucky Power ceased collecting late payment fees from customers, called “delayed payment charges” in Kentucky Power’s tariff, effective March 17, 2020 until the Commission otherwise orders.

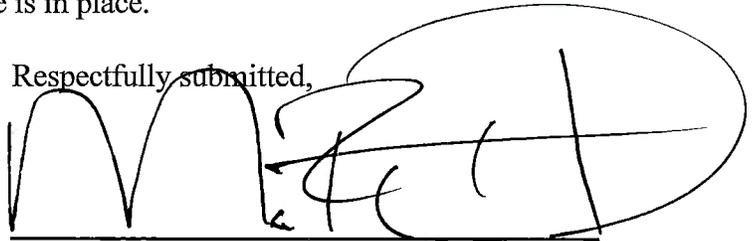
¹ *In the Matter of: Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, P.S.C. Case No. 2020-00085, Order at 9 (Mar. 16, 2020). As the Commission’s order recognized, the Company announced on March 13, 2020 that it was suspending terminations of service.

² *Id.* at 4.

Kentucky Power believes that certain language in its tariff could be read, however, as requiring Kentucky Power to charge delayed payment charges.³ Specifically, Kentucky Power's tariff states that, for accounts not paid in accordance with the payment terms of the applicable rate schedule, "an additional charge of 5% of the unpaid [portion or balance] will be made."⁴

To the extent that Kentucky Power's tariff requires the Company to charge and pursue collection of delayed payment charges from customers, Kentucky Power respectfully requests that the Commission grant any required deviation from its tariff for the period of time the Commission's late payment charge directive is in place.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Overstreet', is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P. O. Box 634
Frankfort, Kentucky 40602-0634
Telephone: (502) 223-3477
moverstreet@stites.com

COUNSEL FOR KENTUCKY POWER
COMPANY

³ See P.S.C. Ky. No. 11 3rd Revised Sheet Nos. 6-1, 6-5, 6-6, 6-9, 6-10, 7-1, 7-6, 7-7, 9-1, 9-4, 10-2, 11-2, 12-2, 14-4, 16-1, 26-2, 32-3.

⁴ *Id.*