

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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)	Case No. 2020-00174
Regulatory Assets And Liabilities; (4) Approval Of A)	
Certificate Of Public Convenience And Necessity;)	
And (5) All Other Required Approvals And Relief)	

Kentucky Power Company's Motion For Extension
To Answer Certain Data Requests

Kentucky Power Company requests a seven-day extension until March 1, 2021 to answer the data requests identified below. The data requests were served on the Company by Staff and other parties in connection with the further proceedings in this case examining the Company's Tariff N.M.S. I and Tariff N.M.S. II. The responses currently are due February 22, 2021.

Kentucky Power states in support of its motion:

A winter storm consisting of freezing rain, ice, and snow struck the northern portions of Kentucky Power's service territory on February 11, 2021 causing the loss of service to nearly 25,000 customers in Boyd, Carter, Greenup, Lawrence, and Rowan counties. Icing coupled with snow loads contributed to the loss of both distribution and transmission facilities. As of 7:00 p.m., Sunday, February 14, 2021 6,516 customers remained without service.

Restoration efforts are being hampered by icy roads and sub-freezing temperatures. Approximately 800 persons are assisting with restoration efforts in connection with the February 11, 2021 storm, including Kentucky Power personnel, outside contractors, and personnel from the Company's affiliates. The Company nevertheless anticipates it will require multiple additional days until to restore service to all customers affected by the February 11, 2021 storm.

The Company's meteorological service is predicting a second winter storm over the period February 14-16, 2021. One-half to three-quarters of an inch of ice is predicted for the Pikeville and Hazard, Kentucky areas, four to eight inches of wet snow/sleet mixed with up to one-quarter inch of ice is forecast for the Ashland, Kentucky area, and moderate icing is predicted for the Whitesburg, Kentucky area. This second winter storm could hamper ongoing restoration efforts and result in additional outages. An additional 300 contractors are traveling to the Company's service territory to assist with restoration efforts for this second storm.

Certain Kentucky Power personnel involved in or responsible for storm restoration efforts also are required for the preparation and review of the following data request responses:

KPSC 8-12

KPSC 8-13

KPSC 8-14

KPSC 8-15

KPSC 8-18

KYSEIA 3-1

KYSEIA 3-5

Joint Intervenors 3-16


This limited extension is being requested to allow affected persons to devote their efforts to the Company's storm restoration efforts and not for purposes of delay.

The Company anticipates that the preparation and review of responses to the remaining data requests will be undertaken by persons not required for storm restoration efforts. An extension

is not being sought for the remaining data requests.

Wherefore, Kentucky Power Company respectfully requests an extension until and including March 1, 2021 to respond to the eight data requests identified above.

Respectfully submitted,



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