

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 Clarification

Kentucky Power Company moves the Public Service Commission of Kentucky for an Order clarifying *nunc pro tunc* the Commission’s January 13, 2021 Order (“Order”)¹ and February 22, 2021 Order on rehearing (“Rehearing Order”):² (a) amending the tables found at Section II and Section III on page 3 of 3 of Appendix A to modify the stated short-term debt rate to conform to the 2.23 percent short-term debt rate found to be reasonable at page 39 of the Order; and (b) amending the Rehearing Order to permit Kentucky Power to implement EV charging rates for General Service (“Tariff G.S.”) and Large General Service (“Tariff L.G.S.”) customers. Neither requested clarification affects the Company’s revenue requirement.

The Company states in support of its motion as follows:

¹ Order, *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 Regulatory Assets And Liabilities; (4) Approval Of A Certificate Of Public Convenience And Necessity, And (5) All Other Required Approvals And Relief* Case No. 2020-00174 (Ky. P.S.C. January 13, 2021).

² Order on Rehearing, *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 Regulatory Assets And Liabilities; (4) Approval Of A Certificate Of Public Convenience And Necessity, And (5) All Other Required Approvals And Relief* Case No. 2020-00174 (Ky. P.S.C. February 22, 2021).

A. Short-Term Debt Rate.

At page 39 of its Order the Commission found “the cost of short-term debt ... of 2.23 percent ... to be reasonable.”³ The tables displayed in Section II and Section III of page 3 of 3 of Appendix A nevertheless list a short-term debt cost of 1.71 percent. The use of the approved 2.23 percent cost for short-term debt approved at page 39 in lieu of the 1.71 percent cost for short-term debt displayed in the tables has no effect on the Company’s revenue requirement because the short-term debt capital ratio was fixed by the Commission at 0.00 percent. Nevertheless, it is in the best interest of the Company’s customers, the Commission, the parties, and the Company that the short-term debt cost displayed in Sections II and III of page 3 of 3 of Appendix A accurately reflect the Commission’s Order.

B. Tariff E.V. For Tariff G.S. and Tariff L.G.S. Customers

The Company on rehearing requested that the Commission amend its Order approving residential EV charging rates because the Company could not implement residential EV charging rates until advanced metering infrastructure was approved and deployed.⁴ The Company did not seek to amend the Commission’s Order authorizing it to implement EV charging rates for its Tariff G.S. and L.G.S. customers. The Commission’s Rehearing Order expanded the requested relief to include Tariff G.S. and Tariff L.G.S. customers.⁵

³ Order at 39.

⁴ Motion of Kentucky Power For Rehearing, *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 Regulatory Assets And Liabilities; (4) Approval Of A Certificate Of Public Convenience And Necessity, And (5) All Other Required Approvals And Relief* Case No. 2020-00174 at 35 (Ky. P.S.C. Filed February 2, 2021) (*See e.g.* “The Company cannot implement residential EV charging rates until AMI is deployed”; and “Accordingly, the Company requests that the Commission amend its Order to clarify that the proposed residential charging EV charging rates are conditionally approved to be implemented upon approval of a CPCN for AMI meters.”) The Order approved EV charging rates for Tariff G.S. and Tariff L.G.S. customers in addition to approving the rates for residential customers. Order at 87-89.

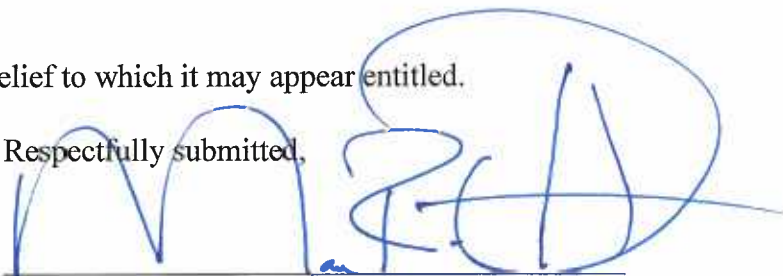
⁵ Rehearing Order at 24-25; 28-29.

Because the Company did not request rehearing with respect to that portion of the Order approving EV charging rates for Tariff G.S. and Tariff L.G.S. customers, and because EV charging rates *can be implemented* in accordance with the applicable safety codes for Tariff G.S. and Tariff L.G.S. customers in the absence of AMI technology, the Company respectfully requests that the Rehearing Order be clarified by an order *nunc pro tunc* to permit Kentucky Power to implement EV charging rates for Tariff G.S. and Tariff L.G.S. customers.

Wherefore, Kentucky Power Company respectfully requests that the Commission enter an order *nunc pro tunc*:

1. Modifying the short-term debt cost shown in Section II and Section III of Appendix A of the Commission's January 13, 2021 Order to reflect the 2.23 percent cost found to be reasonable at page 39 of the Order;
2. Modifying the Commission's February 22, 2021 Order to authorize the Company, as was originally approved in the January 13, 2021 Order, to implement EV charging rates for Tariff G.S. and Tariff L.G.S. customers; and
3. Granting the Company all other relief to which it may appear entitled.

Respectfully submitted,



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