

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter Of:

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| Electronic Application Of Kentucky |) | |
| Power Company For An Order Establishing |) | |
| the Form of Notice To Be Employed |) | Case No. 2020-00174 |
| In Its Upcoming Application for A |) | |
| General Adjustment Of Rates And Other Relief |) | |

Application

Kentucky Power Company (“Kentucky Power”) applies to the Commission pursuant to 807 KAR 5:001, Section 16(2)(b) and 807 KAR 5:001, Section 22 for an Order permitting Kentucky Power to provide abbreviated newspaper notice of its upcoming applications for rate adjustment. This application is made to reduce the costs associated with the anticipated filing of the Company’s application to adjust its rates and thereby reduce the level of any rate adjustment for the Companies’ customers. Kentucky Power states in support of its application:

Applicant

1. Kentucky Power is an electric utility organized as a corporation under the laws of the Commonwealth of Kentucky in 1919.¹ The post office address of Kentucky Power is 1645 Winchester Avenue, Ashland, Kentucky 41101. The Company’s electronic mail address is kentucky_regulatory_services@aep.com.

2. Kentucky Power is engaged in the generation, purchase, transmission, distribution, and sale of electric power. Kentucky Power serves approximately 165,200 customers in the following 20 counties of eastern Kentucky: Boyd, Breathitt, Carter, Clay,

¹ A certified copy of Kentucky Power’s Articles of Incorporation and all amendments thereto was attached to the Joint Application in Case No. 99-149 as Exhibit 1. The Company’s May 22, 2020 Certificate of Existence is attached as **Exhibit 1**.

Elliott, Floyd, Greenup, Johnson, Knott, Lawrence, Leslie, Letcher, Lewis, Magoffin, Martin, Morgan, Owsley, Perry, Pike, and Rowan. Kentucky Power also supplies electric power at wholesale to other utilities and municipalities in Kentucky for resale. Kentucky Power is a utility as that term is defined at KRS 278.010.

3. Kentucky Power is a wholly-owned subsidiary of American Electric Power Company, Inc. (“AEP”).

4. Kentucky Power anticipates filing an application for a general adjustment of its rates and charges and certain other relief no later than June 30, 2020.

5. Kentucky Power is serving a copy of this Application by e-mail upon counsel for each party granted leave to intervene in the Company’s most recent rate case.²

Method of Notice of Publication

6. 807 KAR 5:001, Section 17(2) requires a utility to provide notice to its customers of any general rate adjustment at the time of filing its application and further sets forth the permissible form and manner of such notice. The most practical and cost-effective means among of the four methods of notice established by the regulation³ for Kentucky Power to provide the

² *In the Matter of: Electronic Application Of Kentucky Power Company For (1) A General Adjustment Of Its Rates For Electric Service; (2) An Order Approving Its 2017 Environmental Compliance Plan; (3) An Order Approving Its Tariffs And Riders; (4) An Order Approving Accounting Practices To Establish Regulatory Assets Or Liabilities; And (5) An Order Granting All Other Required Approvals And Relief, Case No. 2017-00179.*

³ 807 KAR 5:001, Section 17(2)(b) provides: “If a utility has more than twenty (20) customers, it shall provide notice by:

1. Including notice with customer bills mailed no later than the date the application is submitted to the commission;
2. Mailing a written notice to each customer no later than the date the application is submitted to the commission;
3. Publishing notice once a week for three (3) consecutive weeks in a prominent manner in a newspaper of general circulation in the utility’s service area, the first publication to be made no later than the date the application is submitted to the commission; or
4. Publishing notice in a trade publication or newsletter delivered to all customers no later than the date the application is submitted to the commission.

required notice is to publish the notice once a week for three consecutive weeks in a prominent manner in each newspaper of general circulation in its service territory.

7. A lengthy notice is required by the scope and detail of the information required by 807 KAR 5:001, Section 17 to be presented. Kentucky Power's notice in connection with its most recent application for general adjustment of its rates comprised 20 single-spaced typewritten 8 ½ x 11 pages. Kentucky Power estimates that absent the relief requested by this Application the notice to be published in connection with the Company's anticipated rate application would be of equal or greater length.

8. The notice is required to be published in each of the 20 newspapers of general circulation in the Company's service territory.

9. The cost of publishing the notice in conformity with the regulation is significant. The cost of the original notice published by Kentucky Power in Case No. 2017-00179 totaled \$663,049. The Company anticipates the cost of publishing the complete notice required the Commission's regulations for the Company's anticipated rate case to be filed later this year will be comparable to, or exceed, the cost of the notice for Case No. 2007-00179. The cost of publishing the notice constitutes a rate case expense that may be recovered through the newly-established rates.

10. The abbreviated form of notice proposed below will reasonably inform the public of the Company's application while yielding significant savings as compared to the full notice required by 807 KAR 5:001, Section 17.

Kentucky Power Company's Proposed Form Of Notice

11. Kentucky Power proposes to publish an abbreviated form of notice. The abbreviated notice will contain:

- (a) the complete notice required by the Commission's regulation for the Company's proposed residential rate changes, as well as the additional required information for residential customers by the Commission's regulations;⁴
- (b) An abbreviated notice of the adjustments to non-residential rates. This abbreviated notice will identify each non-residential rate schedule the Company proposes to adjust, and will indicate the availability of further information concerning the proposed adjustments at the Kentucky Power and Commission websites, as well as Kentucky Power's Ashland, Pikeville, and Hazard offices.⁵
- (c) The abbreviated notice also will indicate that a complete printed or electronic copy any applicable rate schedule may be obtained by written or electronic mail request to the Company.

A copy of each proposed notice for Kentucky Power is attached as Exhibit A to this Application.

12. Kentucky Power proposes to provide, in connection with the publication of its proposed abbreviated notice, the following additional public awareness measures:

- (a) Kentucky Power will post at its Ashland, Pikeville, and Hazard offices a copy of the notice conforming to 807 KAR 5:001, Section 17. The conforming notice will be posted coincident with the first newspaper publication of its abbreviated notice and remain posted until completion of Kentucky Power's rate case;
- (b) Kentucky Power will post on its website a copy of the notice conforming to 807 KAR 5:001, Section 17. The Company's website also will provide a hyperlink to the location on the Public Service Commission's website where case documents and tariff filings are available. The posting and hyperlink will be posted to the Company's website coincident with the first newspaper publication of its abbreviated notice and remain posted until completion of Kentucky Power's rate case;

⁴ 807 KAR 5:001, Section 16(2)(b) directs that a coupon be included in the abbreviated notice. Kentucky Power's proposed abbreviated notice provides multiple means by which the full notice may be requested and thus does not include a coupon. To the extent a deviation is required from the regulation Kentucky Power requests a deviation to permit it to provide the expanded means of requesting the full notice. If the Commission nevertheless believes a coupon should be included it will amend its proposed notice to do so.

⁵ Kentucky Power's offices are located at 1645 Winchester Avenue, Ashland, Kentucky 41101. (606-327-2600); 1400 E. Main St. Hazard, KY 41701 (606-436-1322); and 3249 North Mayo Trail Pikeville, KY 41501 (606-437-3827).

(c) Kentucky Power will include with the bills for all of its Kentucky retail customers a general statement explaining its application for rate adjustment. The statement will be included beginning cycle 1 of the first billing cycle following the Company's filing of its application to adjust its rates;

(d) Kentucky Power will provide notice of the application to legal counsel for each entity granted intervention in Case No. 2017-00179. The notice will inform the recipient of notice of the filing of the Company's application and will provide a hyperlink to the location on the websites of the Company and the Public Service Commission where case documents and tariff filings are available;

(e) Kentucky Power will seek to post a copy of its notice conforming to 807 KAR 5:001, Section 17 in each public library located in Kentucky Power's service territory. The notice will be posted on or about the time the abbreviated customer notice is published. The Company will request that the notice remain posted throughout the entirety of the rate proceedings;

(f) Kentucky Power will issue press advisories to all known news media organizations that cover the areas within their certified territory advising of the filing of the Company's application. The notice also will include a hyperlink to the location on the websites of Kentucky Power and the Commission where case documents and tariff filings will be available. The hyperlink to the Kentucky Power website also will contain the published newspaper notice. The hyperlink will be posted on the Company's website coincident with the filing of the Company's application and will remain during the pendency of the rate case proceedings.

(g) A complete public version of the Company's application to adjust its rates and filed with the Commission will be posted on Kentucky Power's website. The application will be posted coincident with the filing of the Company's application to adjust its rates.

(f) Kentucky Power will electronically upload with its application to adjust its rates a separate a copy its notice conforming to 807 KAR 5:001, Section 17. The copy will be entitled "Customer Notice of Rate Adjustment." The uploading of the separate copy is intended to enable customers reviewing the Commission's website to locate the notice without difficulty.

13. Kentucky Power anticipates the proposed abbreviated notice will reduce publication costs approximately \$400,000.

14. Kentucky Power anticipates that the newspaper publication of the proposed abbreviated notice, in conjunction with the additional public awareness measures to be provided

by Kentucky Power, will provide notice equal to the newspaper notice required by 807 KAR 5:001, Section 17.

15. 807 KAR 5:001, Section 22 authorizes the Public Service Commission to grant deviations from the requirements of Chapter 1 of Title 807 of the Kentucky Administrative Regulations upon the showing of good cause. In addition, 807 KAR 5:001, Section 16(2)(b) provides the Commission may authorize Kentucky Power to provide abbreviated newspaper notice. As set out above, good cause exists for the grant of leave to Kentucky Power to publish the abbreviated notice described above, in conjunction with the other notices to be provided by Kentucky Power, in lieu of the notice required by 807 KAR 5:001, Section 17.

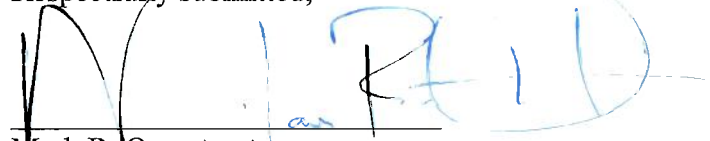
WHEREFORE, Kentucky Power respectfully requests the Commission enter a declaratory order no later than June 15, 2020.

1. Granting leave to Kentucky Power to deviate from the requirements 807 KAR 5:001, Section 17 and authorizing the Company to publish, in conjunction with the other notices and actions described above, the abbreviated notice of its proposed rate adjustment in the form set forth in Exhibit A to this application;

2. Granting Kentucky Power Company all other appropriate relief.

This 29th day of May, 2020.

Respectfully submitted,



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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served by e-mail transmission on the intervenors in Case No. 2017-00179 by transmitting an electronic copy to the persons below this 29th day of May 2020:

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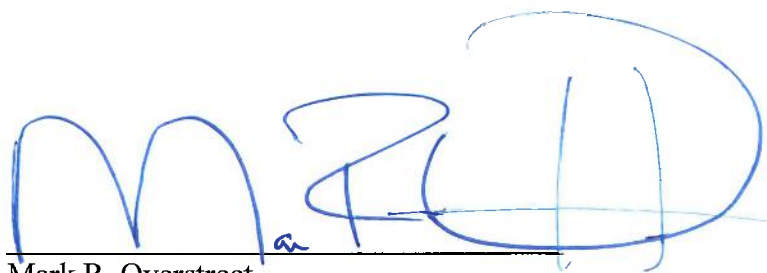
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A handwritten signature in blue ink, appearing to read 'MRO', is written above a horizontal line. The signature is stylized and cursive.

Mark R. Overstreet