## 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 Reply To The "Response And Request For Informal Conference Of Attorney General And Kentucky Industrial Utility Customers"

Kentucky Power Company joins the Attorney General and Kentucky Industrial Utility

Customers, Inc. in respectfully requesting the expeditious establishment of rates to permit the

amortization of the Rockport Deferral regulatory asset, as well as the implementation of the

Rockport Offset, in accordance with the terms of the Commission-approved settlement

agreement in Case No. 2017-00179. Kentucky Power further respectfully requests the

Commission to enter a procedural schedule that permits the prompt resolution of the Company's

August 12, 2022 filing.

The Company also joins the Attorney General and KIUC in requesting the Commission schedule an informal conference at the Commission's convenience.

Kentucky Power continues to review the matters the Attorney General and KIUC raise in their joint response. Without addressing any specific issue, or characterization by the Attorney General and KIUC of the requirements of the Commission-approved settlement agreement in Case No. 2017-00179, the Company states that the amortization of the Rockport Deferral regulatory asset and the implementation of the Rockport Offset are under the terms of the Settlement Agreement largely self-executing. *See e.g.* Tariff Sheet 35-1; Exhibit 2 to November

22, 2017 Settlement Agreement. Further, the Company notes that in connection with the Settlement Agreement's requirement that Kentucky Power's 2023 return of equity be calculated for purposes of the Rockport Offset using the Company's "per books as reported SEC" financial statements, Liberty Utilities Co. committed in Case No. 2021-00481 that "Liberty will not seek to recover any transaction or one time transition costs (as defined by Liberty in testimony) from customers."

The Company reserves the right to respond further to any matter identified by the Attorney General and KIUC in their August 17, 2022 response, or otherwise, if required.

Respectfully submitted,

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<sup>&</sup>lt;sup>1</sup> Order, In the Matter of: Electronic Joint Application Of American Electric Power Company, Inc. Kentucky Power Company And Liberty Utilities Co. For Approval Of The Transfer Of Ownership And Control Of Kentucky Power Company, Case No. 2021-00481 Appendix A at 3, 4 (Ky. P.S.C. May 4, 2022).