DATA REQUEST

KPSC 1_1 Refer to Case No. 2008-00169, Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity up to Thirty Kilowatts (Ky. PSC Jan. 8, 2009), Appendix A.

a. Provide red-lined tariff sheets for any updates or changes made to the utility's tariff regarding the interconnection and net-metering guidelines since the implementation of such guidelines in Case No. 2008-00169.

b. Provide any safety or engineering requirements currently required or available to net metering and interconnection customers to help ensure safety and reliability that are not required under the Commission's Interconnection and Net Metering Guidelines.

c. Provide the current percent of cumulative capacity of the utility's single hour peak load during calendar year 2025. Explain how the utility calculated this percentage.

d. Provide the case number where each change or update was approved.

RESPONSE

a. and d. There have been no updates or changes made to the Company's tariffs specifically regarding the interconnection and net-metering guidelines since implementation of the guidelines in Case No. 2008-00169.

b. Net metering and interconnection customers are required to comply with the AEP DER Technical Interconnection and Interoperability Requirements ("TIIR"). A copy of this document was provided as Exhibit 1 to the Company's supplemental brief filed April 6, 2026. The AEP TIIR specifies the technical requirements for the interconnection of distributed energy resources to the distribution systems of AEP's operating utilities including Kentucky Power and is consistent with the applicable IEEE standard.[1]

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[1] *IEEE Standard for Interconnection and Interoperability of Distributed Energy Resources with Associated Electric Power Systems Interfaces*, IEEE Standard 1547-2018.

c. 0.43%. This value was calculated based on Kentucky Power's 2026 total net metering facility capacity (5.75 MW) that was in service as of June 2026 divided by Kentucky Power's 2025 highest peak (1,347 MW) which occurred on Jan 29, 2025 at 0900.

Witness: Lerah M. Kahn

Witness: Stevi N. Cobern (b)

Kentucky Power Company
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DATA REQUEST

KPSC 1_2 Describe how many net-metering and interconnection customers the utility has, including what type of generating facility and energy storage, if applicable, each customer has.

RESPONSE

Kentucky Power has 426 net-metering customers receiving services under the NMS-I or NMS-II tariffs as of July 8, 2026. All net-metering customers are solar generating facilities; 64 of the 426 facilities include energy storage.

Witness: Stevi N. Cobern

DATA REQUEST

KPSC 1_3 Provide a breakdown of the approximate costs for the utility associated with interconnection for the past five years. In this response, separate the approximate costs associated with level 1 and level 2 applications.

RESPONSE

All Kentucky Power net metering customers are solar generating facilities and inverter based. They were likely all evaluated and approved as Level 1 applications. The Company does not track the costs of field work associated with net metering, distributed energy resource ("DER") customers separately from other non-net metering DER customer work. The estimated labor for DER application processing in 2025 was $48,357 and the estimated costs for software and IT support for Kentucky Power's online DER interconnection application system in 2025 was $123,682.

Witness: Katie M. Legates

DATA REQUEST

KPSC 1_4 Provide an overview of how the interconnection application and agreement process works. In this overview, explain approximately how long each step in the process takes, who is responsible for initiating each step of the process, when progress is communicated to the applicant, and what costs are associated with this process for the utility and applicants. Also explain, if a customer does not qualify or is ineligible during the review process, the protocols and considerations for coming to that determination and communicating that decision to the applicant.

RESPONSE

#	Step	Approx. Length	Initiating Party	Communication to Applicant
1	**DER Application Request** The customer, or their delegate/installer, submits an Interconnection Service Request.	Varies by Applicant	Applicant	• Applicant receives email notification that the application has been received and is moving to Request Verification.
2	**DER Request Verification** Application is reviewed by Kentucky Power and sent back to applicant for edits, as needed, until complete. The application moves to Technical Review when all necessary edits have been completed by the applicant.	Less than 10 business days	Kentucky Power	• If needed, the applicant receives an email notification requesting edits to their application.

#	Step	Approx. Length	Initiating Party	Communication to Applicant
3	**Technical Review** Most Kentucky Power net-metering applications are automatically approved at a base-level review, without need for a detailed engineering technical screen. Applications approved at this level move to Interconnection Agreement. Applications that are not automatically approved continue to a Level 1 evaluation without further applicant action. Applications that are approved at Level 1 move to Interconnection Agreement following applicant acceptance of the results. When an application cannot be approved at Level 1, the applicant is provided with the evaluation results and options for next steps. In addition to continuing to a Level 2 evaluation, options may include modifying the project design or distribution system upgrades. The applicants must choose how to proceed with their application. Applications that are approved at Level 2 move to Interconnection Agreement following applicant acceptance of the results. When an application cannot be approved at Level 2, the applicant is provided with the evaluation results and options for next steps. Options may include modifying the project design or distribution system upgrades. The applicants must choose how to proceed with their application.	Less than 2 business days	Kentucky Power	• Applications evaluated under Level 1 or Level 2 criteria receive an email notification of the evaluation results.
4	**Interconnection Agreement** Customer signs the Interconnection Agreement, after which they receive their Approval letter; permitting the applicant to construct but not operate the DER project.	Varies by Applicant	Applicant	• Applicant receives an email notification prompting them to sign their Interconnection Agreement. • Applicant receives a copy of their signed Interconnection Agreement via email. • Applicant receives their Approval letter via email.

#	Step	Approx. Length	Initiating Party	Communication to Applicant
5	**Construction** The applicant constructs the DER project and then submits evidence of the installation to Kentucky Power.	Varies by Applicant	Applicant	
6	**Installation Verification** Kentucky Power reviews the submitted installation evidence and, if needed, sends the application back for edits. The application moves to Meter Change when all necessary edits have been completed by the applicant.	Less than 3 business days	Kentucky Power	• If needed, the applicant receives an email notification requesting edits to their application.
7	**Meter Change** Kentucky Power installs/configures the customer meter to accommodate the DER.	Less than 7 business days	Kentucky Power	• Applicant receives an email notification informing them they have entered the Meter Change (Installation) phase.
8	**In-Service** Following the meter change, the applicant is issued a Permission to Operate (PTO) letter and is permitted to operate their DER project.			• Applicant receives the PTO letter via email when exiting the Meter Change phase.

If, at any time during the application review process, it is determined that the customer's application is ineligible to interconnect, the customer is notified via email of the finding and informed of what changes would be required, to their project's design or to AEP systems, to move forward with interconnection and the associated costs. If a customer refuses to modify their design or pay for system upgrades, they cannot proceed with the interconnection.

Witness: Stevi N. Cobern

Witness: Katie M. Legates

Kentucky Power Company
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DATA REQUEST

KPSC 1_5 Explain whether the utility recovers in rates any expenses for the interconnection application process. If not, explain why not.

RESPONSE

Yes, Kentucky Power recovers expenses for interconnection if they are a) in excess of the applicable fees or b) no fees exist. The applicable fees currently approved are:

Tariff	Level	Application, Inspection, and Processing Fee(s)
Net Metering Service	1	N/A (only for eligible generating facilities in service before May 15, 2021)
Net Metering Service	2	N/A (only for eligible generating facilities in service before May 15, 2021)
Net Metering Service II	1	N/A
Net Metering Service II	2	\$100 – Application fee \$1,000 (up to) – If an impact study is required
Cogen/SPP	N/A	\$100 plus \$1/kW of nameplate capacity for the proposed qualifying facility – Application fee

Witness: Lerah M. Kahn

DATA REQUEST

KPSC 1_6 Explain which IEEE Standard is currently applicable for purposes of interconnection. If IEEE Standard 1547-2018 is not currently applicable, explain the utilities' position for implementing IEEE Standard 1547-2018.

RESPONSE

As of January 1, 2024, Kentucky Power has adopted IEEE Std 1547™-2018, for all DER interconnected to its distribution system.

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2020-00302
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Dated June 30, 2026

DATA REQUEST

KPSC 1_7 Explain the interconnection requirements if a customer does not qualify or is ineligible during the review process for a level one application; a level two application; and both levels.

RESPONSE

If, at any time during the application review process, it is determined that the customer's application is ineligible to interconnect, the customer is notified via email of the finding and informed of what changes would be required to the proposed project's design or to AEP systems in order to move forward with interconnection and the associated costs. If a customer refuses to modify their design or pay for system upgrades, they cannot proceed with the interconnection. Examples include:

- A customer's project is too large to qualify for the net metering tariff. The customer could downsize their project to meet the tariff requirements or take service under the COGEN/SPP tariff.
- A customer's application does not meet AEP's technical requirements for interconnection because the required manual disconnect switch is in the wrong location. The customer is advised of how to modify their design and where to relocate the switch to, to comply and be eligible.
- A customer's application does not meet AEP's technical requirements for interconnection because the DER facilities size is larger than the existing service transformer. The customer could downsize their project to be compatible with the existing transformer or pay to have the transformer upgraded to a larger size.

Witness: Katie M. Legates

DATA REQUEST

KPSC 1_8 Explain how behind the meter battery energy storage resources are considered under the existing tariff for both net-metering and non-net metering customers.

RESPONSE

The Company considers any energy storage system that is A/C-coupled with the renewable energy system (i.e. solar generating system) to be a part of a single system. The nameplate capacity of the energy storage system and the nameplate capacities of the renewable energy system are summed together to determine the total nameplate capacity of the DER system. For example, if a solar generating facility's nameplate capacity is 40 kW and an A/C-coupled energy storage system's nameplate capacity is 40 kW, the total nameplate capacity is 80 kW and the DER system is not eligible for net-metering.

Witness: Lerah M. Kahn

DATA REQUEST

KPSC 1_9 Explain what safety and technical standards are used to safely and reliably integrate behind-the-meter battery energy storage resources. Explain, if applicable, what changes to software, communications, billing, and utility systems would need to change in order to accommodate third party DER-aggregation. If not applicable, explain why not.

RESPONSE

Behind-the-meter battery energy storage resources that operate in parallel with Kentucky Power's distribution system are required to comply with the AEP DER Technical Interconnection and Interoperability Requirements ("TIIR"). A copy of this document was provided as Exhibit 1 to the Company's supplemental brief filed April 6, 2026. The AEP TIIR specifies the technical requirements for the interconnection of distributed energy resources to the distribution systems of AEP's operating utilities including Kentucky Power and is consistent with the applicable IEEE standard.

- Kentucky Power is continuing to evaluate what changes will need to be made to accommodate third party DER aggregations.
- Please also see the comments provided to the Indiana Utility Regulatory Commission that was provided as Exhibit 2 to the Company's supplemental brief filed April 6, 2026.

Witness: Katie M. Legates

VERIFICATION

The undersigned, Stevi N. Cobern, being duly sworn, deposes and says she is the Distribution Operations Customer Support Manager for Kentucky Power, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Stevi N. Cobern

Stevi N. Cobern

Commonwealth of Kentucky)
) Case No. 2020-00302
County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Stevi N. Cobern, on July 13, 2026.

Marilyn Michelle Caldwell

Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

MARILYN MICHELLE CALDWELL
Notary Public
Commonwealth of Kentucky
Commission Number KYNP71841
My Commission Expires May 5, 2027

VERIFICATION

The undersigned, Lerah M. Kahn, being duly sworn, deposes and says she is the Manager of Regulatory Services for Kentucky Power, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Lerah M. Kahn

Lerah M. Kahn

Commonwealth of Kentucky)
) Case No. 2020-00302
County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lerah M. Kahn, on July 14, 2026.

Marilyn Michelle Caldwell

Notary Public

MARILYN MICHELLE CALDWELL
Notary Public
Commonwealth of Kentucky
Commission Number KYNP71841
My Commission Expires May 5, 2027

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

VERIFICATION

The undersigned, Katie M. Legates, being duly sworn, deposes and says she is a Distribution Modeling & Analysis Manager for American Electric Power Service Corporation, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Katie M. Legates

State of Ohio)
) Case No. 2020-00302
County Of Franklin)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Katie M. Legates, on 7-13-2026.

Notary Public

NOTARIAL SEAL
STATE OF OHIO

Lillian Catherine Whitcomb
Notary Public, State of Ohio
My Commission Expires:
July 07, 2027

My Commission Expires 7-7-2027

Notary ID Number —