

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

An Electronic Examination Of The Application Of)	
The Fuel Adjustment Clause Of Kentucky Power)	
Company From November 1, 2020 Through October)	Case No. 2023-00008
31, 2022)	

Kentucky Power Company’s Motion to Amend Procedural Schedule

Kentucky Power Company (“Kentucky Power” or the “Company”) respectfully moves the Public Service Commission of Kentucky (“Commission”) for an order to be issued **on or before September 18, 2023**, amending the Commission’s September 6, 2023 Order establishing a procedural schedule in this case. As grounds for the motion, the Kentucky Power states that there is good cause for an extension of certain deadlines in the current procedural schedule as described herein.

In addition to this matter, there are two additional matters involving Kentucky Power pending concurrently before the Commission, including the Company’s 2023 rate case¹ (“2023 Rate Case”) and the Company’s Integrated Resource Planning Report (“IRP Case”).²

In the 2023 Rate Case³ and the IRP Case,⁴ the Commission set procedural schedules which include deadlines similar to, or that materially overlap with, those scheduled in this matter. For example, Kentucky Power’s responses to Commission Staff’s initial requests for

¹ *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) A Securitization Financing Order; And (5) All Other Required Approvals And Relief*, Case No. 2023-00159.

² *In The Matter Of: Electronic 2022 Integrated Resource Planning Report Of Kentucky Power Company*, Case No. 2023-00092.

³ *See Order, 2023 Rate Case* (Ky. P.S.C. July 20, 2023).

⁴ *See Order, IRP Case* (Ky. P.S.C. July 28, 2023).

information and to the testimony topics identified in the Commission's September 6, 2023 Order in this matter are currently both due on September 22, 2023, while responses to supplemental data requests from the Commission Staff and four intervenors are due in the 2023 Rate Case on September 25, 2023 (the next business day). In addition, Kentucky Power's responses to supplemental data requests in this matter are due on November 17, 2023, intervenor testimony is due on November 27, 2023, and Kentucky Power's data requests to the intervenors are due on December 7, 2023. Each of these deadlines materially overlap with the Company's preparation for, or attendance at, the seven-day evidentiary hearing currently set in the 2023 Rate Case for November 28, 2023 through December 6, 2023.

Importantly, many of the same people and resources involved in preparing testimony, responses to data requests, and other regulatory filings before this Commission in the 2023 Rate Case and IRP Case would also be responsible for preparing items in this matter, which may leave those resources overly-strained in their efforts to prepare and file a robust and timely testimony and responses in each of those cases.

Finally, unlike the 2023 Rate Case, the resolution of this matter is not governed by a statutory deadline, and the Commission has not yet set a hearing for this matter. In addition, the Commission granted Kentucky Power's request to extend the procedural schedule in the IRP Case for similar reasons because the initial procedural schedule similarly conflicted with the procedural schedule in the 2023 Rate Case and another case that has since been submitted for decision.⁵ Thus, Kentucky Power respectfully submits that extensions of deadlines in this matter,

⁵ *In The Matter Of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct 69 kV Transmission Lines And Associated Facilities In Pike County, Kentucky*, Case No. 2023-00040.

of approximately 90 days, as set forth below will neither prejudice the Commission, the intervenors, nor unduly delay the resolution of this matter.

The current remaining deadlines in this matter are as follows:

Current Remaining Procedural Schedule⁶	Due Date
Kentucky Power's Direct Testimony and responses to Initial Commission Staff Data Requests	09/22/2023
Supplemental Data Requests to Kentucky Power	10/06/2023
Kentucky Power's Responses to Supplemental Data Requests	10/20/2023
Additional Supplemental Data Requests to Kentucky Power	11/03/2023
Kentucky Power's Responses to Additional Supplemental Data Requests	11/17/2023
Intervenor Testimony	11/27/2023
Data Requests to Intervenor	12/07/2023
Intervenor Responses to Data Requests	12/18/2023
Kentucky Power's Rebuttal Testimony	01/03/2024

For good cause shown herein, Kentucky Power respectfully requests that the procedural schedule in this matter be amended to extend each of the deadlines in this matter by approximately 90 days as follows:

⁶ See September 6, 2023 Order herein.

Proposed Amended Procedural Schedule	Due Date
Kentucky Power's Direct Testimony and responses to Initial Commission Staff Data Requests	12/22/2023
Supplemental Data Requests to Kentucky Power	01/08/2024
Kentucky Power's Responses to Supplemental Data Requests	01/19/2024
Additional Supplemental Data Requests to Kentucky Power	02/02/2024
Kentucky Power's Responses to Additional Supplemental Data Requests	02/16/2024
Intervenor Testimony	02/27/2024
Data Requests to Intervenor	03/07/2024
Intervenor Responses to Data Requests	03/18/2024
Kentucky Power's Rebuttal Testimony	04/03/2024

The Attorney General and Kentucky Industrial Utility Customers, Inc. have represented that they have no opposition to the Company's request to amend the procedural schedule in this matter as detailed herein.

WHEREFORE, for good cause as described herein, Kentucky Power respectfully requests the Commission to enter an Order modifying the current procedural schedule in this matter and establishing a revised procedural schedule reflecting the proposed amendments herein.

Respectfully submitted,

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