COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

The Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct 69kV Transmission Lines And Associated Facilities In Pike County, Kentucky ("Belfry Area Transmission Line Project")	)))))	Case No. 2023-00040

DIRECT TESTIMONY OF

BRIAN K. WEST

ON BEHALF OF KENTUCKY POWER COMPANY

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

A. My name is Brian K. West. My position is Vice President, Regulatory & Finance for Kentucky Power Company ("Kentucky Power" or the "Company"). My business address is 1645 Winchester Avenue, Ashland, Kentucky 41101.

II. BACKGROUND

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.

A. I received an Associate's degree in Applied Science (Electronics Technology) and a Bachelor's degree in Business Management, both from Ohio University, in 1987 and 1988, respectively. I obtained a Master of Business Administration degree from Ohio Dominican University in 2008.

I began my utility industry career when I joined Ohio Power Company as a customer services assistant in Portsmouth, Ohio in 1989. This was a supervisor-in-training position, where I worked in each area of the office (*e.g.*, cashiering, new service, and credit and collections) to gain knowledge and experience with every aspect of managing an area office. After completing the training program, I initially supervised meter readers in the Portsmouth office until being promoted to office

supervisor in 1993. In 1997, when the area offices closed, I transferred to Chillicothe, Ohio and accepted the position of customer services field supervisor, with responsibility for managing customer field representatives who primarily worked with customers on high-bill and other inquiries.

In 2000, after American Electric Power Company ("AEP") merged with Central and South West Corporation, I moved to Columbus, Ohio, where I held various positions in Customer Operations, mostly in process improvement and supporting regulatory filings. In 2008, I transferred to AEP's Regulatory Services department, where I supported various filings before public service commissions in Arkansas, Indiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia, and West Virginia, as well as the Public Service Commission of Kentucky ("Commission").

In 2010, I was promoted to regulatory case manager, with responsibility for energy efficiency/demand response filings, integrated resource plan filings, and various renewable filings across AEP's service territory. In 2016, I moved to a case manager role with primary responsibility for most Appalachian Power Company filings before the Public Service Commission of West Virginia, the Virginia State Corporation Commission, and the Tennessee Public Utility Commission. I accepted the position of Director of Regulatory Services for Kentucky Power in February 2019. I assumed my current position as Vice President, Regulatory & Finance for Kentucky Power Company in January 2021.

Q. WHAT ARE YOUR RESPONSIBILITIES AS VICE PRESIDENT, REGULATORY & FINANCE FOR KENTUCKY POWER?

A. I am primarily responsible for managing the regulatory and financial strategy for Kentucky Power. This includes planning and executing rate filings for both federal and state regulatory agencies, as well as filings for certificates of public convenience and necessity before this Commission. I am also responsible for managing the Company's financial operating plans. Included as part of this responsibility is the preparation and coordination of various capital and operation and maintenance ("O&M") budgets to ensure that adequate resources such as debt, equity, and cash are available to build, operate, and maintain Kentucky Power's electric system assets used to provide service to the Company's retail and wholesale customers.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I have filed testimony in support of Kentucky Power's various regulatory filings since 2019. Specifically, I filed testimony in Case Nos. 2021-0346 and 2022-00118 in support of the Company's certificate of public convenience and necessity ("CPCN") applications for the Garrett Area Improvements Project and the Wooton-Stinnett 161kV Transmission Rebuild Project, which were granted by this Commission. I also filed testimony in the Company's previous application for a CPCN to construct the Belfry Area Transmission Line Project, Case No. 2022-00236, which was denied without prejudice by this Commission.

III. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I am testifying in support of Kentucky Power's application for a certificate of public convenience and necessity to build the "Belfry Area Transmission Line Project" (the "Project"). Specifically, I will:

- Provide an overview of the Project;
- Introduce the other witnesses supporting the Company's Application;
- Provide an overview of the right-of-way ("ROW") activities
- Detail the Company's compliance with the notice requirements for this proceeding; and
- Address the financial aspects of the Project.

Q. WHAT WITNESSES WILL BE OFFERING TESTIMONY IN SUPPORT OF KENTUCKY POWER'S APPLICATION?

A. Two additional witnesses provide testimony in support of the Application. First, Company Witness Koehler describes the process for the review of the underlying needs and solutions (*i.e.,* the proposed Project) under PJM's Regional Transmission Expansion Plan ("RTEP") for projects needed due to equipment condition, performance and reliability needs. Company Witness Koehler will also outline the scope of work to be undertaken, identify alternative electrical solutions that were evaluated along with the Project as proposed, and provide a summary of the Project's advancement through the PJM review process.

Second, Company Witness Reese will describe the methodology employed in the siting study that was used to identify the transmission line route and substation sites. Company Witness Reese also explains the public outreach process, the results and conclusions of the siting study, and the environmental studies and approvals that will be required.

Q. IS THIS APPLICATION SIMILAR TO THE APPLICATION FILED IN CASE NO. 2022-00236?

A. Yes. Here, like in Case No. 2022-00236, the Company seeks a CPCN to construct the Belfry Area Transmission Line Project. In Case No. 2022-00236, the Commission, by its Order dated January 5, 2023, denied the Company's application for a CPCN without prejudice. The Commission found that "Kentucky Power ha[d] established sufficient evidence to demonstrate that the proposed transmission project is needed to provide adequate, efficient and reasonable service."[1] However, the Commission also found that "Kentucky Power ha[d] failed to show that the proposed project is the least cost, most reasonable solution to meet the well-documented need for improved transmission facilities in the Belfry area."[2] Thus, the Commission held that "there [was] insufficient evidence in the record to demonstrate that the proposed project does not result in wasteful duplication."[3]

The proposed Project described in this application is the same as the proposed Project presented in Case No. 2022-00236. However, in this application, the Company provides additional evidence to address the Commission's basis for its previous denial[4], which demonstrates that the proposed solution is the least cost, most reasonable solution to meet the need in the area, and that the proposed solution will not result in wasteful duplication. The Company evaluated alternative solutions to the proposed solution that the Company ultimately found did not meet the need in the area and/or ultimately would cost substantially more than the proposed solution. The specifics of

[1] Order at 20, *In The Matter Of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Construct 69kV Transmission Lines And Associated Facilities In Pike County, Kentucky*, Case No. 2022-00236 (Ky. P.S.C. January 5, 2023).

[2] *Id.* at 22.

[3] *Id.*

[4] *Id.*

those alternatives as well as the estimated costs to construct each are shown in **EXHIBIT 22** (Comparison of Project with Alternative Solutions 1 and 2) and are addressed more fully by Company Witness Koehler.

IV. THE PROJECT OVERVIEW

Q. PLEASE DESCRIBE THE PURPOSE OF THE PROJECT.

A. The Project is a Baseline and asset renewal project intended to address aging infrastructure and voltage violations.[5] The Project involves building approximately 6.5 miles of 69kV transmission line, retiring 8.2 miles of existing 46kV transmission line, building the proposed Orinoco 69kV Substation, and retiring the existing Belfry 46kV Substation. The Project is being constructed to allow for the retirement of 8.2 miles of 46kV transmission line between the existing Spriggs and Stone Substations. Approximately 6.5 miles of this retirement is located in Kentucky with the remainder in West Virginia. Company Witness Koehler provides further details regarding the Project's purposes and benefits.

Q. HAS THE PROJECT BEEN SUBMITTED TO PJM INTERCONNECTION LLC ("PJM")?

A. Yes. PJM assigned the Project the Baseline ID of b3288 and Supplemental ID of s2446. Further details of the Project's status before PJM are provided by Company Witness Koehler.

Q. PLEASE DESCRIBE THE PROJECT.

A. The Project consists of five Baseline and seven Supplemental components.

[5] Baseline and Supplemental projects (asset renewal projects are a subset of the latter) are further defined in the testimony of Company Witness Koehler at p. 6.

The five Baseline components include:

(1) The construction of approximately 4.2 miles of 69kV transmission line from the existing New Camp Substation to the proposed Orinoco Substation;

(2) The construction of approximately 2.3 miles of 69kV transmission line from the proposed Orinoco Substation to the existing Stone Substation;

(3) At the Stone Substation, Circuit breaker A will remain in place and be utilized as the T1 low-side breaker. Circuit Breaker B will remain in place, obviating the need for new foundations, but electrically will now be used as the new Hatfield (via Orinoco and New Camp) 69kV breaker. A new 69kV Circuit Breaker E will be added for the Coleman Line exit in this substation. As noted in the Supplemental work described below, existing 46kV equipment will be retired from this Substation;

(4) The New Camp 69kV Tap will be reconfigured. This will include access road improvements/installation, temporary wire and permanent wire work along with dead end structures installation; and,

(5) At New Camp Substation, rebuild the 69kV bus, add 69kV motor-operated air break switch ("MOAB") and replace the 69kV Ground switch Z1 with a 69kV Circuit Switcher on the New Camp Transformer. Company Witness Koehler describes the temporary work in more detail.

Q. PLEASE DESCRIBE THE SEVEN SUPPLEMENTAL COMPONENTS OF THE PROJECT.

A. The Supplemental components include:

(1) Replacing the Belfry Substation with the Orinoco Substation by installing a 69kV double box bay and 12kV rural bay to be built in the clear southwest of existing Belfry station, and install 69/12kV 20 MVA transformer and three 12kV breakers;

(2) Retiring Belfry 46kV Substation;

(3) Retiring 46kV equipment from Stone Substation;

(4) Replacing MOAB Y at the Hatfield Substation with a 69kV Circuit Breaker towards Stone Substation (via New Camp and Orinoco Substations);

(5) Retiring the 46kV equipment at Spriggs Substation towards Stone Substation (via Belfry Substation);

(6) Retiring 0.75 miles of the Turkey Creek 69kV Tap transmission line; and

(7) Retiring approximately 8.2 miles of the 46kV Sprigg – Stone 46kV Circuit.

See **EXHIBIT 4** (Proposed Route Maps) to the Application for more information regarding the substation upgrades proposed in the Project.

Company Witness Koehler describes each of these components in more detail, and addresses the need for the work, including the components, and the benefits provided.

Q. WILL KENTUCKY POWER COMPANY CONSTRUCT AND OWN ALL OF THE COMPONENTS OF THE PROPOSED PROJECT?

A. Yes. This is in response to the Commission's January 13, 2021 Order in Case No. 2020-00174 at pages 59-64.

Q. WILL AEP KENTUCKY TRANSMISSION COMPANY, INC. CONSTRUCT, OWN, OR OPERATE ANY OF THE PROJECT COMPONENTS?

A. No.

V. CENTERLINE AND ROW

Q. KENTUCKY POWER FILED MAPS ILLUSTRATING THE PROPOSED CENTERLINE OF THE REBUILT TRANSMISSION LINE AND EXPANDED RIGHT OF WAY AS EXHIBIT 4 (PROPOSED ROUTE MAPS) TO ITS APPLICATION. COULD THAT CENTERLINE CHANGE?

A. Yes. Constructability issues, access requirements, and conditions that are not evident until final engineering, or that arise as a result of landowner negotiations may result in Kentucky Power being required to place the identified centerline and adjacent ROW outside the ROW indicated on **EXHIBIT 4** (Proposed Route Maps).

Q. HOW DOES THE COMPANY PROPOSE TO ADDRESS CHANGES TO THE CENTER LINE IF NECESSARY?

A. Consistent with the guidance provided by the Commission's April 13, 2022 Order in Case No. 2021-00346, the Company seeks authority to relocate the centerline and associated ROW up to 200 feet in any direction from the location as shown on the maps filed with the Application if required to address these conditions or issues. This nearly 400-foot-wide area is consistent with the width of the proposed ROW at its widest points, and as illustrated on **EXHIBIT 4** (Proposed Route Maps) consists of two strips of a buffered area surrounding the centerline and ROW that allows flexibility for minor adjustments that result during final engineering. If a change within this area becomes necessary, the Company proposes that it would file a motion in this proceeding to request approval to move the centerline more than 200 feet in any direction from the centerline, as it appears on the maps filed into the record in this proceeding in **EXHIBIT 4** (Proposed Route Maps). The motion would identify the proposed new location of the

centerline, the affected landowner(s), and state in detail, and with technical specificity, the need for the proposed modification of the centerline. Kentucky Power would serve the motion for approval to move the centerline on any affected landowner(s), even if not a party to this proceeding. The Company respectfully requests that upon receiving adequate information to consider the request, the Commission use its best efforts to rule upon such motions within 14 days.

Q. WHY SHOULD THE COMMISSION ALLOW FOR CHANGES UP TO 200 FEET IN ANY DIRECTION?

A. An area of 200 feet in any direction is consistent with the width of the proposed ROW at its widest point, nearly 400 feet wide. The ability to relocate the centerline within this area is necessary to address issues that may emerge in connection with ground surveys, final engineering, and ROW negotiations.

Q. WHAT IS THE WIDTH OF THE PROPOSED ROW?

A. The width of the proposed ROW is 100 feet. The Company may extend the ROW beyond 100 feet when required for engineering, safety, and construction reasons. The following proposed ROW widths are expected to extend beyond the 100 feet due to conductor sway during high wind conditions in the current design:

- Span 5 – 6: 130ft
- Span 11 – 12: 120ft
- Span 15 – 16: 160ft
- Span 18 – 19: 120ft
- Span 21 – 22: 130ft
- Span 32 – 33: 360ft
- Span 33 – 34: 130ft
- Span 34 – 35: 110ft
- Span 35 – 36: 130ft

Q. HOW DO THESE PROPOSED ROW WIDTHS COMPARE TO THE NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL ("NERC") ROW REQUIREMENTS FOR 46 AND 69kV TRANSMISSION LINES?

A. NERC standards require that the width of secured transmission line ROW shall be sufficient that the installed facilities can operate to their full design capacity without limitations from current or reasonably anticipated changes in land use within or beyond the limits of the secured ROW. For transmission lines of voltages of 69kV and below composed primarily of H-frame construction, the typical ROW width is 100 feet. A width of 100 feet has historically been adequate to establish conductor clearances to the edge of ROW. Steep mountainous terrain, long span lengths, and varying structure types are a few of the factors that may influence the need for additional width. At a minimum, the determined final ROW extents must encompass conductor sway, structure components, and sufficient clearances to vegetation in order to maintain a reliable electric transmission system while accounting for the adequate safety of the public.

Q. WHAT IS 'CONDUCTOR SWAY'? HOW DOES THIS IMPACT ROW WIDTHS FOR TRANSMISSION LINE PROJECTS?

A. Conductor sway is defined as the distance from the overhead conductor at rest to the physical location of the conductor when displaced by wind. The wind is applied in multiple directions to determine the maximum conductor displacements, both left and right, from centerline. Adequate ROW should be obtained to encompass the resulting conductor zone; the area defined by the position of outermost conductors, extended vertically to ground, when the conductors are displaced by 6 psf (~48 mph) and are at

60° F. The wind is applied in multiple directions to determine the maximum conductor displacements, both left and right, from centerline.

Q. ARE THE SEGMENTS DESCRIBED IN YOUR TESTIMONY ABOVE MORE SUSCEPTIBLE TO CONDUCTOR SWAY THAN OTHER SEGMENTS IN THE NEW LINE?

A. Yes, the Company has identified these particular spans as more susceptible to conductor sway in high wind conditions based on the current preliminary design. The Company identified the spans on pages 10-11 of this testimony as susceptible to conductor sway beyond the standard 100-foot ROW. It is possible that other spans may in the future be identified as susceptible to conductor sway issues. As stated in the Application, changes within the specified corridor are possible until landowner negotiations, (environmental, cultural, and geological) studies, and final engineering are completed. These changes have the potential to impact the identified spans and/or classify additional spans.

Q. UNDER WHAT CONDITIONS WOULD THE COMPANY ACQUIRE ROW GREATER THAN 100 FEET?

A. In certain areas, the Company may extend the ROW beyond 100 feet to accommodate guy wires that extend more than 60 feet from the centerline. In connection with certain long spans, and where needed to allow for tree-clearing on the uphill side of the centerline to prevent trees from falling into the line or its structures, the ROW will extend to 150 feet (75 feet on each side of the centerline). In cases of unusually steep terrain or extremely long spans, the Company may acquire ROW that extends to 350-

400 feet (175 to 200 feet on each side of the centerline) or more for the reasons indicated above.

Q. IS KENTUCKY POWER SEEKING UNLIMITED DISCRETION TO RELOCATE THE TRANSMISSION LINE AND ROW?

A. No. Kentucky Power is seeking authority to move the centerline and associated ROW only within the limits indicated above.

Q. WERE OWNERS OF PROPERTY LOCATED WITHIN 400 FEET OF THE CENTERLINE PROVIDED MAILED NOTICE OF THE COMPANY'S APPLICATION?

A. Yes, the Company provided notice to persons owning property crossed by or adjacent to the Proposed Route for the Project. Persons owning property within this notification corridor were mailed the same notice provided to persons owning property within the indicated ROW. The full details of the Company's efforts to engage all landowners within or adjacent to Proposed Route for the Project is further described in Company Witness Reese's testimony as well as the Siting Study found in **EXHIBIT 10.**

Q. WILL THE COMMISSION BE INFORMED OF THE FINAL LOCATION OF THE LINE AND THE ADJACENT ROW?

A. Yes. Kentucky Power will file with the Commission a revised plan showing the final location of the proposed line, structures, and the proposed substation after construction is completed.

Q. HAS THE COMMISSION GRANTED A SIMILAR REQUEST BY THE COMPANY IN A PREVIOUS TRANSMISSION CPCN APPLICATION?

A. Yes, the Company made the same request to shift the centerline up to 200 feet in either direction of the location that appeared on the map it submitted with its application in Case No. 2022-00118 ("Wooton-Stinnett 161kV Transmission Rebuild Project").[6] The Commission granted the Company's request, finding that the "request [was] reasonable in light of the nature of the terrain over which the proposed facilities will traverse, and the need for flexibility in response to landowner concerns."[7]

VI. CONSTRUCTION SCHEDULE

Q. WHEN DOES KENTUCKY POWER PROPOSE TO BUILD THE TRANSMISSION LINE AND THE SUBSTATIONS IF THE CERTIFICATE IS GRANTED?

A. The Company anticipates beginning construction during the third quarter of 2024. Work is anticipated to be complete by the fourth quarter of 2025. The planned in-service date sequence is as follows:

- **3rd Quarter 2024:** Anticipated start of construction.
- **3rd Quarter 2024:** Begin construction of distribution line work between the proposed Orinoco and the existing Belfry substations.
- **3rd Quarter 2024:** Begin grading access roads to the 69KV transmission line locations and tree clearing for the transmission line. Grading for access roads planned to be completed by the 4th quarter 2024.
- **4th Quarter 2024:** Begin construction of transmission lines and substation upgrades.

[6] *In The Matter Of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Rebuild The Wooton-Stinnett Portion Of The Hazard-Pineville 161kV Line In Leslie County, Kentucky*, Case No. 2022-00118.

[7] Order at 22, *In The Matter Of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Rebuild The Wooton-Stinnett Portion Of The Hazard-Pineville 161kV Line In Leslie County, Kentucky*, Case No. 2022-00118 (Ky. P.S.C. September 22, 2022).

- **4th Quarter 2025:** Place the Project in-service.

VII. NOTICES

Q. DID KENTUCKY POWER COMPLY WITH THE REQUIREMENTS OF 807 KAR 5:120, SECTION 2(3) BY PROVIDING NOTICE TO ADJOINING LANDOWNERS WHOSE PROPERTY MIGHT BE AFFECTED BY THE PROJECT?

A. Yes. Notifications as required by 807 KAR 5:120 Section 2(3) were sent to landowners within the proposed 400 foot-wide filing area. The notifications were mailed using the addresses for the subject parcels shown in the offices of the Pike County Property Valuation Administrator or the best available information. Further, Kentucky Power mailed notices to landowners that might be affected by the Project. Company Witness Reese's testimony and the Siting Study found in **EXHIBIT 10** provides more detailed information on outreach efforts.

Q. WHEN WAS THE LANDOWNER NOTICE MAILED?

A. The required landowner notice was mailed on June 9, 2023. The list of landowners within the proposed ROW and notification corridor to whom the notice was mailed, including the required verification of mailing, is attached as **EXHIBIT 12** (Notice Mailed to Landowners and Verification) to the Application.

Q. DID THE JUNE 9, 2023 MAILED NOTICE CONTAIN THE INFORMATION REQUIRED BY 807 KAR 5:120, SECTION 2(3)(A)-(E)?

A. Yes. The form of the notice is attached to the Application as **EXHIBIT 12** (Notice Mailed to Landowners and Verification).

Q. DID KENTUCKY POWER PUBLISH THE REQUIRED NOTICE IN THE PIKE COUNTY NEWSPAPER OF RECORD?

A. Yes. The required notice of the Company's intent to construct the Project and of this proceeding was published on Tuesday, May 16, 2023, in the *Appalachian News Express*. The published notices contained all information required by 807 KAR 5:120, Section 2(5). A copy of the published notice and the affidavit of publication are attached as **EXHIBIT 14** (Published Notice and Affidavit of Publication) to the Application.

VIII. FINANCIAL ASPECTS OF THE PROJECT

Q. WHAT IS THE PROJECTED COST OF THE PROJECT?

A. The total detailed estimate of the Project cost is approximately $49 million. That sum comprises: (a) approximately $30 million for transmission line work including ROW acquisition; (b) approximately $10 million for construction and upgrade of the substations and switch structure; (c) approximately $8 million for station removals and (d) approximately $1 million for distribution line work.

Q. DOES THE APPROXIMATELY $49 MILLION COST ESTIMATE DESCRIBED ABOVE AND SET OUT IN THE APPLICATION REPRESENT A FIXED AND FINAL COST?

A. No. The estimate represents the best engineering assessment of the costs as of the date of this Application. The exact cost will not be known until the Project is complete.

Q. HOW WILL THE PROJECT COST BE FUNDED?

A. Kentucky Power anticipates funding the cost of the Project through its operating cash flow and other internally generated funds.

Q. WILL THE COST OF THE PROJECT MATERIALLY AFFECT THE FINANCIAL CONDITION OF KENTUCKY POWER COMPANY?

A. No. Kentucky Power's assets, net of regulatory assets and deferred charges, as of March 31, 2023, totaled $2.273 billion. The cost of the Project thus represents an increase of approximately 2.16% percent in those assets. The project will not require the issuance of debt and will not affect the completion of any other capital project.

Q. WHAT IS THE PROJECTED COST OF OPERATION FOR THE PROPOSED FACILITIES AFTER THEY ARE COMPLETED?

A. Kentucky Power estimates the annual operating cost will be approximately $70,000 for general maintenance and inspection. The projected additional annual ad valorem taxes resulting from the Project are expected to total approximately $603,200.

Q. WILL THE IMPLEMENTATION OF THE PROJECT AS PROPOSED RESULT IN WASTEFUL DUPLICATION?

A. No. The Project will not duplicate any existing facilities in the area and will not result in an excess of capacity over need, or excess investment in relation to the productivity and efficiency to be gained. Given the original vintage from the 1940s of the Stone-Sprigg 46kV line, and the many noted equipment conditions in Company Witness Koehler's testimony, coupled with identified voltage drop violations, the need for the Project is clear. In addition, new customers are being added in this area and the Project adds a new 69kV source to help serve those customers and resolve the voltage violations. Finally, this work will eliminate the need to rebuild the entire 8.2 miles of the Sprigg-Stone 46kV Circuit and allow retirement instead. Company Witness Koehler provides a further explanation on the alternatives considered in his testimony,

which demonstrates that the proposed solution is the least cost, most reasonable solution to meet the need in the area, and that the proposed solution will not result in wasteful duplication.

IX. STAKEHOLDER INPUT

Q. HAVE RELEVANT STAKEHOLDERS BEEN AFFORDED AN OPPORTUNITY TO PROVIDE INPUT REGARDING THE PROPOSED TRANSMISSION LINE ROUTE?

A. Yes. Prior to the Company's application in Case No. 2022-00236, representatives of Kentucky Power met with stakeholders including local public officials in Pike County, the affected landowners, and the general public. Company representatives also met with the Tierney Lawrence Land Company, a mining company that owns permitted mining land in the Study Area and Kinzer Business Realty, which owns several parcels within the Study Area. Kentucky Power representatives held a virtual open house that included interactive overview maps, fact sheets, project updates and news releases, and schedule information. A live virtual town hall was also conducted on September 9, 2021, in which Company representatives provided a presentation with an opportunity for a question-and-answer session at the end. The Company employed multiple communication channels to apprise all stakeholders of the Project, including a Project-specific website that provided for a comment period. Of note, because the Project has not changed from the time input was obtained through the outreach activities described, additional activities were not undertaken to avoid unnecessary additional expense. The

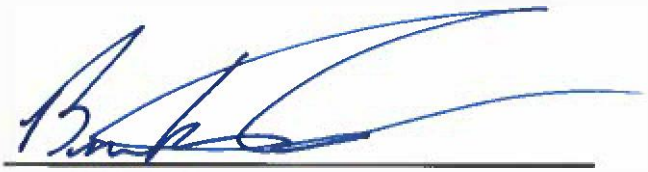
full details of the Company's efforts to engage all stakeholders are provided in Company Witness Reese's testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is the Vice President, Regulatory & Finance for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing testimony and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.



Brian K. West

Commonwealth of Kentucky)
) Case No. 2023-00040
County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Brian K. West, on June 8, 2023.

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 5/5/2027

Notary ID Number KYNP71841