

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic 2022 Integrated Resource Planning Report)
Of Kentucky Power Company) Case No. 2023-00092

Kentucky Power Company’s Motion for Extension of Time to File Next IRP

Kentucky Power Company (“Kentucky Power” or “Company”) respectfully requests, pursuant to 807 KAR 5:058, Section 2(1)(c), that the Public Service Commission of Kentucky (“Commission”) extend the deadline for Kentucky Power to file its next Integrated Resource Plan (“IRP”) by one year, or until March 20, 2027. Kentucky Power respectfully requests that the Commission enter an order granting this Motion **on or before May 15, 2025**.

Pursuant to the filing schedule in 807 KAR 5:058, Section 2; the Commission’s June 4, 2021 Order in Kentucky Power’s 2019 IRP case (Case No. 2019-00443);¹ and the Commission’s October 27, 2022 Order in Case No. 2022-00353,² Kentucky Power filed its most recent IRP in this case on March 20, 2023. According to the filing schedule in 807 KAR 5:058, Section 2, Kentucky Power’s next IRP must be filed on or before March 20, 2026.

The Commission’s regulations require Kentucky Power to take Commission Staff’s suggestions and recommendations into consideration, and respond to them, in its next IRP.³ Kentucky Power’s current IRP remains under review by the Commission in this case as of the date of this filing. In order to meet the current March 20, 2026 deadline to file the next IRP, Kentucky

¹ *In the Matter of: Electronic 2019 Integrated Resource Planning Report Of Kentucky Power Company*, Case No. 2019-00443.

² *In The Matter Of Electronic Application Of Kentucky Power Company To Extend Date To File 2022 Integrated Resource Plan*, Case No. 2022-00353.

³ *See* 807 KAR 5:058, Section 11(3)-(4).

Power would be required to begin preparing the IRP very soon. Commission Staff has not yet issued its comments and recommendations (“Staff Report”), and Kentucky Power therefore cannot begin preparations for its next IRP in earnest until the Staff Report is filed and adopted by the Commission. Additional time also would allow Kentucky Power to further evaluate potential thermal resources as part of its next IRP. The federal environmental regulatory climate continues to evolve and time to evaluate the resulting impacts could better inform the IRP resource selection process.

Kentucky Power therefore requests an extension to file its next IRP on or before March 20, 2027, in order to accommodate additional time for the Staff Report to be issued and adopted by the Commission and to better evaluate the impact of the evolving federal environmental regulatory climate.

The Commission has previously granted Kentucky Power extensions to file its IRP. In Case No. 2002-00377, the Commission granted Kentucky Power an additional 39 days to file its 2002 IRP.⁴ As part of the motion, Kentucky Power stated that additional time was needed to gather and assemble the required data due to structural changes related to its merger with Central and South West Corporation, changes to the AEP Interconnection Agreement from a five-member to a three-member power pool, and the retirement of the individual traditionally responsible for preparing its IRP.⁵ The Commission granted the extension, finding that it was “necessitated by a number of material changes that have occurred since Kentucky Power filed its last IRP in 1999.”⁶

⁴ Order, *In The Matter Of: The 2002 Integrated Resource Planning Report Of Kentucky Power Company D/B/A American Electric Power Company*, Case No. 2002-00377 (Ky. P.S.C. October 21, 2002).

⁵ *See id.*

⁶ *Id.*

In Case No. 2004-00420, the Commission granted Kentucky Power an additional 48 days to file its 2009 IRP.⁷ Kentucky Power stated that the Company’s most recent forecast and planning information would not be available to meet the originally established filing date, and requested the extension of time so that the most recent information can be incorporated into its filing.⁸ For these reasons, the Commission found good cause to extend the deadline an additional 48 days.⁹

In Case No. 2022-00353, the Commission granted Kentucky Power 90 additional days to file its IRP while the sale of Kentucky Power to Liberty Utilities Company (“Liberty”) was pending.¹⁰ Kentucky Power stated that additional time was necessary to prepare and file the IRP to allow Liberty to actively participate in the IRP planning process.¹¹ Kentucky Power stated that, if the extension was granted, the 2022 IRP would more closely represent long-term plans for Kentucky Power under Liberty’s ownership.¹² For these reasons, the Commission found good cause to extend the deadline an additional 90 days.¹³

WHEREFORE, Kentucky Power Company respectfully requests that the Commission enter an Order on or before May 15, 2025:

1. Granting Kentucky Power an extension to file its next Integrated Resource Plan no later than March 20, 2027; and
2. Granting such further relief to which the Company may be entitled

⁷ Order, *In The Matter Of: Application Of Kentucky Power Company For Approval Of A Stipulation And Settlement Agreement Resolving State Regulatory Matters*, Case No. 2004-00420 (Ky. P.S.C. February 23, 2009).

⁸ *See id.*

⁹ *Id.*

¹⁰ Order, *In The Matter Of Electronic Application Of Kentucky Power Company To Extend Date To File 2022 Integrated Resource Plan*, Case No. 2022-00353 (Ky. P.S.C. Oct. 27, 2022).

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

Respectfully submitted,



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