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

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KENTUCKY POWER COMPANY'S COMMENTS ON COMMISSION STAFF'S REPORT ON THE 2022 INTEGRATED RESOURCE PLAN OF KENTUCKY POWER COMPANY AND RESPONSE TO INTERVENOR COMMENTS

Kentucky Power Company ("Kentucky Power" or the "Company") appreciates the opportunity to provide comments on the Staff Report entered into the record of this case pursuant to 807 KAR 5:058, Section 11(3) and in response to the Comments of Joint Intervenors on the Staff Report in accordance with the Commission's Order dated September 12, 2025. Neither Commission Staff nor Joint Intervenors question the Company's compliance with 807 KAR 5:058 in preparing its integrated resource plan ("IRP"), and, therefore, the Company's comments will be limited to recommendations and observations relevant to the preparation of the Company's next IRP, due to be filed no later than March 20, 2027. Capitalized terms used in these comments and not otherwise defined have the same meaning as in the Company's 2022 IRP.

Kentucky Power's 2022 IRP presents a balanced, well-reasoned view of the Company's resource needs and proposed resource types, quantities, and timing to reliably meet customer needs over the next 15 years. The Preferred Plan was identified as a plan that provides a sound strategy for meeting the IRP's four stated objectives of customer affordability, rate stability, maintaining reliability, and local impact and sustainability. The 2022 IRP Preferred Plan represents the lowest reasonable cost plan for providing its customers with adequate and reliable service.

In support of the Company's Preferred Plan, the Company issued an all-source request for proposals ("RFP") to identify potential power purchase agreements ("PPA") to address the Company's capacity needs. Based on that RFP, the Company sought approval from the Commission in Case No. 2024-00243 to enter into a PPA for a renewable resource, the Bright Mountain Solar project. The Commission ultimately denied the Company's application. Additionally, based on information obtained in the RFP, including the 2024 price updates associated with bids from thermal resources, the Company filed an application in Case No. 2025-00175 to make the necessary investments in the Mitchell Plant to allow the Company to continue to take 50% of the capacity and energy from the Mitchell Plant after December 31, 2028. Case No. 2025-00175 is currently pending before the Commission.

The Company provides the following responses to the Commission Staff's recommendations.

KENTUCKY POWER'S RESPONSES TO STAFF COMMENTS

Section 2 Load Forecast

1. Kentucky Power's Response to Staff's Report – Recommendation 1: Use of Updated Load Forecasts in IRP Scenario Modeling

Staff recommends that Kentucky Power include the most up-to-date load forecast in its IRP when there is a significant addition to load or an extended gap between forecast finalization and IRP filing. Staff further suggests that Kentucky Power run scenario analyses with and without anticipated load additions to better inform resource timing and selection.

Kentucky Power will include the most up-to-date forecast possible in its next IRP, recognizing the need to finalize assumptions for modeling integrity. In addition, the Company will evaluate incorporating an additional sensitivity reflecting potential economic development impacts to further evaluate resource timing and portfolio performance under extreme growth conditions.

Kentucky Power's forecasting process is designed to balance accuracy, modeling integrity, and workflow feasibility. The IRP process involves extensive coordination, multiple modeling steps, and stakeholder input opportunities. To maintain consistency and reliability, fundamental assumptions must remain stable throughout the process once scope and inputs are locked for analysis.

The Company will again include high and low economic scenarios in its next IRP to reflect uncertainty in load growth, customer behavior, and market conditions. These scenarios will be designed to capture a range of potential outcomes, including variations in industrial activity and economic trends. While the current framework addresses uncertainty, Kentucky Power acknowledges that additional sensitivities—such as an "ultra-high" case reflecting potential economic development—could provide further insight into resource timing and portfolio performance under extreme growth conditions.

2. Kentucky Power's Response to Staff's Report – Recommendation 2: Inclusion of Wholesale Customer Load in Forecast Scenarios

Staff recommends that Kentucky Power include anticipated wholesale customer load—such as Olive Hill and Vanceburg—in its IRP forecast scenarios, even if contract expiration dates fall within the planning horizon and negotiations have not yet commenced.

Kentucky Power understands the importance of evaluating the potential impact of wholesale load changes on long-term planning and will explore how best to reflect such load in its next IRP, including whether such contracts should be incorporated into the base forecast or addressed through dedicated sensitivity scenarios, depending on the nature and certainty of the load.

3. Kentucky Power's Response to Staff's Report – Recommendation 3: Consider Demand-side Management ("DSM"), DER, and Demand Response in High-Demand Scenarios

Staff recommends that Kentucky Power consider plausible customer responses—such as increased DSM, behind-the-meter generation, and demand response programs—as secondary moderating effects in future high-demand forecast scenarios.

The Company will consider potential secondary moderating effects—such as increased DSM, behind-the-meter generation, and demand response—in future high-demand forecast scenarios in the Company's next IRP. The Company's current IRP process already accounts factors like equipment efficiencies, DSM efforts, weather, and the economy when analyzing scenarios or possible ranges around the baseline load forecast. Producing scenarios for every possible combination of these factors would be particularly burdensome and create confusion within the modeling process for the IRP. Many of these combinations would result in negatively correlated outcomes that are not additive (such as the proposed scenario of high economic growth, extreme warm weather, and increased DSM).

For this reason, Kentucky Power elects to emphasize the high and low economic scenarios, which capture most plausible variations in load growth. This approach provides a reasonable range for planning purposes and the IRP process. That said, the Company will evaluate how best to address Staff's recommendation in its next IRP, including whether to incorporate these moderating effects directly into the base forecast or through additional sensitivities—such as extreme weather paired with high economic growth—to broaden the range of outcomes considered.

Section 3 Demand-Side Management and Energy Efficiency

1. Kentucky Power's Response to Staff's Report – Recommendation 1: Evaluation and Verification of DSM Program Benefits

Staff recommends that Kentucky Power continue to define and improve procedures to evaluate, measure, and verify both actual costs and benefits of energy savings based on actual dollar savings and energy savings, noting that new DSM programs may have greater impact as Kentucky Power faces a capacity shortfall beginning in 2028.

Kentucky Power will comply with the Commission's Order in Case No. 2024-00115 to continue to evaluate its DSM portfolio. In that proceeding, Kentucky Power proposed two additional DSM programs and has worked throughout 2025 to begin implementing those programs. The Company is committed to making those programs successful and providing a cost-effective suite of DSM programs. To do that, Kentucky Power took an incremental approach to adding DSM programs so that it can effectively and efficiently roll those programs out and gauge customer interest in DSM generally. The programs approved in Case No. 2024-00115 were approved as three-year pilot programs and the Company intends to operate those programs through that three-year period. After the three-year period, the Company will make proposals on the current programs and will evaluate the need and cost-effectiveness of additional programs to present to the Commission at the time. In the interim, the Company will evaluate additional options that may be available to expand its DSM offerings.

2. Kentucky Power's Response to Staff's Report – Recommendation 2: Completion of Market Potential Study

Staff recommends that Kentucky Power conclude its Market Potential Study to identify all DSM programs that could be beneficial to customers.

Kentucky Power completed the Market Potential Study and presented it as part of the Company's application in Case No. 2024-00115.

3. Kentucky Power's Response to Staff's Report – Recommendation 3: Evaluation of Pay As You Save (PAYS) Program

Staff recommends that Kentucky Power study the Pay As You Save (PAYS) program—either independently or as part of its Market Potential Study—to determine whether such a program would be cost-effective and beneficial to customers.

The Commission's final Order in Case No. 2024-00115 stated, "the Commission does not find it reasonable to compel Kentucky Power to convene a IUI working group as there is no evidence that the program would be cost-effective or that Kentucky Power is in a financial position

to support the up-front capital." That said, the Company can evaluate an IUI or PAYS program in advance of proposing its next suite of DSM programs with the understanding that the Company will need appropriate regulatory treatment of those study costs, including but not limited to preapproval of any study costs to be recovered through the Company's DSM surcharge.

4. Kentucky Power's Response to Staff's Report – Recommendation 4: Scrutiny of TEE Program and Reporting in Future IRPs

Staff recommends that Kentucky Power continue to scrutinize the results of its current Targeted Energy Efficiency (TEE) program for cost-effectiveness and provide those results, along with the finalized Market Potential Study, in future IRP filings.

Kentucky Power will comply with this recommendation. The Company notes that its TEE program, in isolation, does not pass the cost-effective tests. However, the Commission has consistently recognized the benefits of the TEE program despite not passing traditional cost-effectiveness tests. This is generally the case with many low-income DSM programs. Kentucky Power still believes the TEE program provides value to our most vulnerable customers and would support continuing the program as part of an overall cost-effective portfolio of DSM programs.

5. Kentucky Power's Response to Staff's Report – Recommendation 5: Monitoring Distributed Generation (DG) Additions

Staff recommends that Kentucky Power continue to monitor DG additions.

Kentucky Power will comply with this request.

6. Kentucky Power's Response to Staff's Report – Recommendation 6: Examination of Additional Low-Income DSM Programs

Staff recommends that Kentucky Power give special attention to examining additional low-income programs that will allow more customers to participate and/or provide easier access to energy efficiency alternatives.

Kentucky Power will comply with this request. In Case No. 2024-00115, the Company proposed to expand its existing TEE program, which is specific to low-income customers, as supported by its Market Potential Study. The Commission approved this expansion. As explained

at the hearing in Case No. 2024-00115, the Company also awarded a grant to support further weatherization through its Community Action Agencies. Additionally, as stated above, low-income DSM programs traditionally struggle to pass cost-effective tests in isolation, but the Company is committed to evaluating additional programs with the understanding they will be part of an overall cost-effective DSM portfolio.

Section 4 Supply-Side Resource Assessment and Integration

1. Kentucky Power's Response to Staff's Report – Recommendation 1: AURORA Zonal Modeling Explanation

Explain how the AURORA model functions when the AEP Zonal resource optimization approach is taken to reach an optimized zonal solution. Include in the response how a zonal approach to Kentucky Power's future resource additions and retirements is affected by the other AEP East OPCOs' resource additions and retirements within the zonal optimized solution.

Kentucky Power respectfully disagrees with the premise of this recommendation, which appears to conflate two distinct modeling components used in the IRP process: the Fundamental Forecast and Kentucky Power's Capacity Expansion Plan.

The Fundamental Forecast,[1] developed using the AURORA model, is a market simulation tool used to assess long-term energy and capacity trends across the broader PJM footprint, and individual zones (including AEP), accounting for transmission constraints. This forecast is not a resource optimization model for Kentucky Power or any individual Operating Company (OPCO). Instead, it utilizes a consistent set of market assumptions—such as fuel prices, emissions costs, and regional load growth—to derive pricing that informs the economic environment in which Kentucky Power operates.

In contrast, Kentucky Power's Capacity Expansion Plan is a stand-alone optimization exercise that uses the AEP zone price developed in the Fundamental Forecast, along with Kentucky

[1] The Fundamental Forecast is described in Section 6.2 of the 2022 IRP.

Power-specific portfolio inputs, constraints, and assumptions to determine the least-cost portfolio of resources to meet its own forecasted load and reliability requirements. This plan is developed independently of other AEP operating company resource decisions and is not derived from a zonal optimization output.

Therefore, the suggestion that Kentucky Power's resource additions and retirements are directly affected by other AEP East operating companies within a zonal optimization framework is not accurate. Kentucky Power's IRP modeling does not rely on a shared zonal optimization solution.[2] Instead, the IRP modeling uses the Fundamental Forecast as a backdrop for market conditions while conducting its own resource planning tailored to Kentucky Power's service territory, regulatory obligations, and customer needs.

2. Kentucky Power's Response to Staff's Report – Recommendation 2: Present Zonal Modeling Results by AEP East OPCO

Present the zonal modeling results in total and broken out by each AEP East OPCOs separately

Kentucky Power will comply if applicable in its next IRP. Nonetheless, Kentucky Power respectfully asserts that this recommendation is not applicable to the IRP modeling framework used in this proceeding. As discussed above, the Fundamental Forecast is a market-wide market simulation—not an operating company level analysis—and does not produce discrete resource plans for each AEP East operating company. It is not designed to allocate or prescribe resource additions or retirements at the operating company level, though it is utilized to produce the commodity price forecast inputs for the Kentucky Power IRP portfolio optimization model.

Kentucky Power's IRP is focused on its own capacity needs and planning decisions. The modeling results presented in the IRP reflect Kentucky Power's stand-alone optimization using its

[2] Staff Report at 17.

own load forecast, reserve margin requirements, and resource constraints. These results are not derived from or dependent on the resource decisions of other AEP entities.

While Kentucky Power supports transparency and coordination across the AEP system, it is important to recognize that the IRP process is utility-specific. Presenting disaggregated modeling results for other AEP operating companies would require speculative assumptions and access to data outside the scope of Kentucky Power's planning responsibilities. Nonetheless, Kentucky Power remains committed to providing clear and comprehensive documentation of its own modeling assumptions, methodologies, and results.

3. Kentucky Power's Response to Staff's Report – Recommendation 3: Seasonal Breakdown of Energy Sales and Resource Planning

> ***Because of Kentucky Power's large winter capacity deficit, it would have been instructive to break up the energy sales and purchases on a seasonal (winter, spring, summer and fall) basis. That would shed light on exactly how the large additions of solar (700 MW) and wind (800 MW) resources affect seasonal energy sales, purchases, reserve margins and whether the proposed CT (480 MW) remained the optimal choice versus the NGCC. For the next IRP, Kentucky Power should present energy sales, purchases, reserve margins and resource additions and retirements on an annual and on a seasonal basis.***

Introducing seasonal breakdowns into the IRP would add complexity without materially improving the accuracy or relevance of the resource planning outcomes. The IRP in this case already accounts for seasonal variability through the use of Effective Load Carrying Capability ("ELCC") values for generating resources, including intermittent resources such as solar and wind, which reflect their contribution to reliability during peak periods—including winter.

Kentucky Power will evaluate providing this seasonal information as requested in its next IRP; however, the modeling software may present limitations to that effort. The Company can report energy market purchases and sales by season in its next IRPs. If necessary for modeling clarity, Kentucky Power can evaluate providing reserve margins and resource additions by season

if it is necessary for the model selection optimization to be more granular than on an annual basis for any scenario.

4. Kentucky Power's Response to Staff's Report – Recommendation 4: Modeling Kentucky Power's Resource Decisions and System Integration

Staff suggests that Kentucky Power's resource decisions may be unduly influenced by broader AEP East OPCO trends toward intermittent resources, and recommends modeling Kentucky Power as a standalone company outside of the AEP system to assess impacts on transmission cost allocations and resource planning. Staff also questions the timing of CT additions relative to the Mitchell divestiture.

Kentucky Power develops its IRP based on Kentucky Power needs. Kentucky Power takes into account resources that may be available to the Company, including the resources and opportunities that the PJM system provides, for the benefit of Kentucky Power customers. Kentucky Power respectfully disagrees with the assertion that its resource decisions are materially affected by the resource choices of other AEP East operating companies. As explained in prior responses and in the IRP itself, Kentucky Power's Capacity Expansion Plan is modeled independently using Kentucky Power-specific inputs, constraints, and assumptions. While the Fundamental Forecast provides a consistent market backdrop, it does not prescribe or constrain Kentucky Power's resource selections. The IRP modeling does not rely on a shared zonal optimization solution, and therefore, the suggestion that Kentucky Power's Preferred Plan is shaped by other operating company decisions is not supported by the modeling framework.

Moreover, Kentucky Power's IRP already models the Company as a standalone entity for purposes of resource planning. The modeling reflects Kentucky Power's unique load forecast, reserve margin requirements, and capacity obligations within PJM. The Company's participation in the AEP system does not alter the structure or outcome of its resource optimization.

Regarding the timing of the proposed CT additions, Kentucky Power modeled the earliest feasible in-service dates based on reasonable assumptions about permitting, siting, and

construction timelines. The IRP reflects a forward-looking snapshot in time, and the timing of resource additions is aligned with the anticipated availability of capacity and the Company's planning obligations under PJM. The suggestion that CTs could have been brought online earlier to coincide precisely with the Mitchell divestiture overlooks the practical realities of project development and the need to balance cost, risk, and feasibility. As noted in the IRP and in other dockets[3], Kentucky Power's planning accounts for the full PJM delivery year and ensures capacity adequacy through a combination of market purchases and new resource additions.

Finally, there is no support in the record of this IRP or elsewhere that Kentucky Power's future within the AEP system is uncertain. Kentucky Power prepares its IRPs based on the information available to it at the time, therefore speculation about drastic changes to its relationships with PJM or the rest of the AEP system would be misplaced. The IRP is a planning document governed by 807 KAR 5:058, focused on identifying a least-cost, reliable portfolio to meet customer needs. Kentucky Power modeled its IRP as a standalone utility within the PJM AEP load zone, consistent with regulatory expectations and industry best practices. The modeling approach already reflects the Company's unique position and obligations.

5. Kentucky Power's Response to Staff's Report – Recommendation 5: Reliability Planning and LOLE Analysis

> ***Staff recommends that Kentucky Power independently examine the reliability of its preferred portfolio options beyond PJM capacity requirements, including evaluating the impact on Loss of Load Expectation (LOLE) either directly or through the PJM zone in which Kentucky Power is located.***

[3] *See e.g. In the Matter of: Electronic Application Of Kentucky Power Company For Approval Of (1) A Certificate Of Public Convenience And Necessity To Make The Capital Investments Necessary To Continue Taking Capacity And Energy From The Mitchell Generating Station After December 31, 2028, (2) An Amended Environmental Compliance Plan, (3) Revised Environmental Surcharge Tariff Sheets, And (4) All Other Required Approvals And Relief,* Case No. 2025-00175.

In its next IRP, Kentucky Power will assess reliability through its stochastic risk analysis where load, resource generation, gas price and market price input variables will be varied through 100s or 1,000s of Monte Carlo simulations. This stochastic risk analysis will project a wide range of system generation, as it compares to load as well as the market imports required to serve load. The analysis will provide the insight needed to assess the robustness of our candidate portfolios (including the Preferred Portfolio) from both a reliability and financial perspective. This approach provides a robust measure of reliability and risk without requiring separate LOLE modeling.

Nonetheless, the Company respectfully disagrees with the implication that planning to meet PJM capacity requirements is insufficient to satisfy Kentucky's reliability standards, and Kentucky Power notes that PJM's reserve margin requirements already incorporate LOLE-based probabilistic modeling. It is important to note that LOLE is inherently a system-level metric, and Kentucky Power's participation in PJM means that its reliability is supported by the collective performance of the PJM footprint. As such, standalone LOLE modeling may not yield meaningful insights unless conducted in coordination with PJM's broader reliability assessments.

As a member of PJM, Kentucky Power is contractually obligated to meet the Installed Reserve Margin (IRM) and the Forecast Pool Requirement (FPR) established by PJM which accounts for the ELCC of generating resources and is designed to ensure regional reliability across a diverse and interconnected footprint. These requirements are based on rigorous probabilistic modeling, including LOLE analysis, and are updated annually to reflect evolving system conditions. By meeting PJM's capacity obligations, Kentucky Power ensures access to a broad and diverse set of resources that provide reliability benefits beyond what could be achieved through isolated planning.

Moreover, as described in Section 7.2.3 of the IRP, Kentucky Power explicitly modeled seasonal reliability, including winter capacity adequacy, and selected a Preferred Plan that maintains reliability across all seasons. The IRP also includes stochastic analysis (Section 6.6) that subjects portfolios to a wide range of market simulations, including generator output volatility and extreme weather conditions, to assess performance under adverse scenarios.

The Company's Preferred Plan is designed to meet both its PJM obligations and its internal reliability needs. The IRP reflects a balanced portfolio of dispatchable and renewable resources, optimized to provide reliable service at the lowest reasonable cost. Kentucky Power's membership in PJM and the AEP system further enhances reliability through access to shared resources, coordinated transmission planning, and operational flexibility.

6. Kentucky Power's Response to Staff's Report – Recommendation 6: Incorporation of Environmental Regulations in IRP Modeling

> ***Staff recommends that Kentucky Power incorporate all current and new environmental regulations into its resource selection and production cost modeling in future IRPs. For regulations under court challenge or stay, Staff suggests modeling portfolios both with and without the regulation and providing justification for any exclusion.***

Kentucky Power will continue to incorporate existing and, as practical, new or stayed environmental regulations into its IRP analysis. Kentucky Power acknowledges that the regulatory landscape is evolving, and in its next IRP, the Company will continue to reflect updated rules and guidance. However, the Company respectfully notes that modeling every regulation under court challenge or administrative review in dual scenarios (with and without) may not always be feasible or meaningful. Kentucky Power will evaluate the status of such regulations on a case-by-case basis and will aim to provide clear justification for any exclusions, consistent with Staff's recommendation.

7. Kentucky Power's Response to Staff's Report – Recommendation 7: Modeling Impacts of Large Data Centers in the AEP Zone

Staff recommends that Kentucky Power, in its next IRP, discuss and model the effect on Kentucky ratepayers of new, large data centers anticipated in the AEP Zone, both as part of the AEP system and in the AEP Zone, but not part the AEP system.

The Company's Fundamental Forecast that provides one of the bases for the Company's IRP takes into consideration the impacts of commodities and loads across the PJM footprint and would reflect the addition of large loads such as data centers. The Fundamental Forecast utilized by the Company in its next IRP will continue to take the addition of large loads such as data centers into consideration.

8. Kentucky Power's Response to Staff's Report – Recommendation 8: Inclusion of Long-Term PPAs and Kentucky-Based Resources

Staff recommends that Kentucky Power include long-term power purchase agreements (PPAs) as potential resource additions in future IRPs and consider intermittent and dispatchable generation resources located in Kentucky.

The Company agrees with the underlying intent of this recommendation and offers the following clarifications and commitments. The Company respectfully clarifies that the 2022 IRP did not exclude PPAs from consideration. Rather, the IRP modeled generic resource types—including renewables and dispatchable generation—without presupposing ownership structure, allowing for flexibility in future procurement decisions.

Furthermore, Kentucky Power has consistently affirmed its openness to Kentucky-based resources, including intermittent and dispatchable generation. The IRP modeling framework does not exclude resources based on geography. Instead, it evaluates resources based on their economic and operational characteristics, using a zonal market simulation that reflects PJM conditions. As noted in the IRP, Kentucky Power included two pricing tiers for wind and solar resources to reflect the range of potential responses that might be received through the RFP, including in-state options.

While the IRP does not model specific PPAs or Kentucky-based resources, this approach is consistent with industry best practices and the purpose of the IRP—to identify a least-cost,

reliable portfolio under a range of plausible future conditions. Specific resource selections, including PPAs, are addressed through the RFP and CPCN processes, where detailed cost-benefit analyses and project-specific evaluations are conducted.

9. Kentucky Power's Response to Staff's Report – Recommendation 9: Inclusion of Updated Forecasts and Modeling in CPCN or PPA Applications

Staff recommends that Kentucky Power include an updated demand forecast and updated supply-side analysis—including resource selection and production cost modeling—as part of any future Certificate of Public Convenience and Necessity (CPCN) or Power Purchase Agreement (PPA).

Kentucky Power will continue to comply with all applicable requirements, including those in KRS 278.020; KRS 278.300; 807 KAR 5:001, Section 14; 807 KAR 5:001, Section 18; and relevant Commission precedent, in any future application for a certificate of public convenience and necessity or for approval to enter into a power purchase agreement.

10. Kentucky Power's Response to Staff's Report – Recommendations 10: Aligning New Generation with Capacity Shortfall

Staff recommends that Kentucky Power align the onboarding of new generation resources with the expected capacity shortfall beginning in 2028 and potentially growing by 2031.

While this recommendation is outside the scope of the IRP process governed by 807 KAR 5:058, Kentucky Power will continue to evaluate its capacity and energy needs and make resource decisions to ensure that those needs are satisfied.

KENTUCKY POWER'S RESPONSE TO JOINT INTERVENORS

Kentucky Power acknowledges the Joint Intervenors' emphasis on stakeholder engagement as a valuable component of the IRP process. The 2022 IRP was prepared in accordance with Commission regulations, and the Company exceeded the minimum requirements by facilitating two stakeholder meetings during the development of the 2022 IRP. These meetings were held with

the express intent of promoting transparency and encouraging meaningful input from interested parties, including the Joint Intervenors.

The Company considered feedback received during these sessions and remains open to continued engagement as part of the development of its next IRP. Kentucky Power understands that stakeholders bring diverse perspectives and information that can enhance planning outcomes. The Company will continue to evaluate how best to support effective engagement, including approaches to data sharing, structured opportunities for feedback, and clear communication of timelines, while ensuring the IRP process remains manageable and consistent with regulatory expectations.

Kentucky Power looks forward to working with stakeholders, including the Joint Intervenors, in its next IRP cycle.

CONCLUSION

As required by 807 KAR 5:058, Kentucky Power evaluated its future resource planning obligations building on reasonable load forecasts, demand-side resource options, as well as supply-side alternatives. Following its review and evaluation, Kentucky Power included its preferred resource plan that represents a balanced generation portfolio. Kentucky Power's 2022 IRP Report complies with the requirements of 807 KAR 5:058.

Respectfully submitted,

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