COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:	:	
	:	
Electronic Application Of Kentucky Power Company For		
An Order Approving Accounting Practices To Establish A		Case No. 2023-00145
Regulatory Asset Related To The Extraordinary Fuel	:	
Charges Incurred By Kentucky Power Company In	:	
Connection With Winter Storm Elliott in December 2022	:	

JOINT PROTEST OF ATTORNEY GENERAL AND KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

The Attorney General of the Commonwealth of Kentucky, by his Office of Rate Intervention ("AG"), and Kentucky Industrial Utility Customers, Inc. ("KIUC") submit this Joint Protest to Kentucky Power Company's ("Kentucky Power" or "Company") May 23, 2023 Application. In that Application, Kentucky Power seeks authority to establish a regulatory asset and defer for future review and recovery \$11.5 million of non-economy purchased power costs incurred in December 2022 that are not recoverable in the fuel adjustment clause ("FAC"). The Company asserts that its Application will benefit customers because approval will allow Kentucky Power to seek securitization of the regulatory asset under recently enacted Senate Bill 192. Kentucky Power requests an expedited ruling by June 5, 2023.

For the reasons discussed below, AG/KIUC oppose the Company's request to establish a regulatory asset for the \$11.5 million of non-economy purchased power costs that were excluded from the FAC. That request is contrary to Commission precedent, contrary to the provisions of the FAC regulation, and would improperly predetermine the issues pending in Case No. 2022-00263 (six-month FAC review) and in Case No. 2022-00190 (statewide investigation of the FAC, purchased power costs and related cost recovery mechanisms). The recently enacted securitization law is intended to save customers money. However, the Company's Application seeks to turn that new law upside down by using it to retroactively recover extraordinary and

non-recurring purchased power costs (approximately \$31 for the average residential customer) that it otherwise would not be entitled to recover in either the FAC or in base rates.

PROTEST

In this proceeding, Kentucky Power proposes to defer as a regulatory asset for later recovery through securitization \$11.5 million of non-economy purchased power costs incurred in December 2022 that were excluded from the FAC. For the average residential customer, the amount at issue here is approximately \$31.¹

The FAC allows for the full recovery of only economy purchased power costs. Kentucky Power determines whether purchases are economy and thus fully recoverable in the FAC (as opposed to non-economy purchases that are only partially recoverable in the FAC) through the use of its hypothetical peaking unit equivalent ("PUE") methodology. The PUE calculation compares the cost of purchased power on an hourly basis to the cost of the Company's highestcost unit or a theoretical natural gas combustion turbine peaking unit. FAC recovery is capped at the \$/MWh cost of the Company's highest cost unit or the theoretical peaking unit. The PUE process occurs in each monthly FAC filing.² The December 2022 PUE disallowance of \$11,519,695 is no different in substance than the \$904,634 PUE disallowance in September 2022 or the \$745,497 PUE disallowance in August 2022.³ The December 2022 PUE disallowance is only larger.

AG/KIUC are currently challenging the Company's implementation of the PUE methodology in Case No. 2022-00263. AG/KIUC witnesses Kollen and Futral assert that the Company incorrectly assumed that the hypothetical 100 MW peaking unit would stop and start every hour of the year, thus improperly adding \$30/MWh to the PUE price cap each hour. They also assert that the Company improperly assumed that the PUE has no size limitation, and that the hypothetical 100 MW peaking unit can grow in size to meet the entirety of the Company's

3 Id.

¹ As shown on the attached 2022 FERC Form 1, 2022 retail sales were 5,391,298 MWh and the average residential customer used 14,578 MWh during the year. \$11,519,695/5,391,298 MWh x 14,578 MWh = \$31.15.

² The relevant FAC pages from 2022 showing the PUE disallowances each month are attached.

load. Granting the instant Application would improperly predetermine the issues raised by AG/KIUC, at least for December 2022.

On November 2, 2022, the Commission opened a statewide investigation into the operation of the FAC and, in particular, purchased power costs and related cost recovery mechanisms - Case No. 2022-190. This Commission action was taken at the request of the Kentucky Senate and was based upon the Commission's own concerns. Granting the instant Application could improperly impact that investigation.

Under very similar circumstances, the Commission denied recovery by East Kentucky Power Company ("EKPC") of \$8,538,787 of non-economy purchased power costs incurred during the Polar Vortex emergency in 2014 (Case No. 2014-00226). The Commission stated that "It [the FAC] was never meant to allow the utility to recover 100% of the fuel costs incurred on a monthly basis, as evidenced by the restrictions set out in the regulation. The Commission believes it important to maintain the limitation for recovery through the FAC of 'non-economy energy purchases' in order to incentivize utilities to keep outages to a minimum and to have sufficient capacity to meet load."4

A reasonable amount of purchased power costs not recovered in the FAC may be recovered in base rates, but only prospectively. The requested deferral would improperly result in the retroactive recovery of a specific amount of purchased power costs not recoverable in the FAC.

The Company claims that if its Application is denied, then it "*instead would pursue their recovery in its upcoming base rate case (without access to the new legislation's securitization option and customer benefits*)."⁵ This is the proper approach. The very small interest rate savings that might be achieved through securitizing a relatively small dollar amount does not outweigh a thorough Commission review. More importantly, in the next rate case, only a reasonable and normal amount of non-economy purchases can be included in base rates. The

⁴ Case No. 2014-00226, Order (January 30, 2015) at 8.

⁵ Application at 4.

Company has laid out a convincing case that the events of December 22-25, 2022 were anything but normal. Assuming a calendar 2022 historic test year, we expect this to be an important issue in the next rate case. For example, Rockport-related issues will have to be pro formed out as the Rockport UPA expired in December 2022. Also, the very poor capacity factors experienced by the Mitchell units in 2022 may have resulted in an unreasonably large amount of non-economy purchases. These types of issues cannot be decided on an expedited basis.

The fact that a securitization statute now exists does not change what costs may be deferred as a regulatory asset. The new law does not expand the definition of what constitutes a regulatory asset. Therefore, the December 2022 PUE disallowance of \$11.5 million, just like all prior PUE disallowances in the FAC, must be taken as an ordinary expense in the year incurred. As proposed by Kentucky Power, the new securitization statute would be turned against customers by allowing for the deferred recovery of costs that would otherwise be written off. The securitization statute was intended to help customers, not hurt them.

WHEREFORE, AG/KIUC request that Kentucky Power's Application be denied.

Respectfully submitted, DANIEL J. CAMERON ATTORNEY GENERAL

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J. MICHAEL WEST LAWRENCE W. COOK ANGELA M. GOAD JOHN G. HORNE II Assistant Attorneys General 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204 Ph: (502) 696-5433 Fax: (502) 573-1005 Michael.West@ky.gov Larry.Cook@ky.gov Angela.Goad@ky.gov John.Horne@ky.gov /s/ Michael L. Kurtz

MICHAEL L. KURTZ, ESQ. JODY KYLER COHN, ESQ. **BOEHM, KURTZ & LOWRY** 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 Ph: (513) 421-2255 Fax: (513) 421-2764 <u>mkurtz@BKLlawfirm.com</u> jkylercohn@BKLlawfirm.com

COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

May 9, 2023

ATTACHMENTS

FINAL FUEL COST SCHEDULE

Month	Ended:	December 2022

A.	Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant)		(+) (+) (+) (+)	\$7,046,750 1,077,344 503,492 0
	Fuel (assigned cost during Forced Outage) (52,445,043 KWH X \$0.043053	`	7.3.35	2 257 017
)	(+)	2,257,916
	Fuel (substitute for Forced Outage)		(-)	0
B.	Sub-total Purchases			10,885,502
-54	Net Energy Cost - Economy Purchases		(+)	0
	Identifiable Fuel Cost - Other Purchases		(+)	36,906,627
	Identifiable Fuel Cost (substitute for Forced Outage)			
	(52,445,043 KWH X \$0.067242)	(-)	3,526,510
	Purchase Adjustment for Peaking Unit Equivalent		(-)	<u>11,519,695 (1)</u>
	Sub-total			21,860,422
C.	Inter-System Sales Fuel Costs			1,751,731
D.	SUB-TOTAL FUEL COST (A + B - C)			\$30,994,194
E.	Fuel-Related PJM Billing Line Items	December 2022		1,302,348
F.	GRAND TOTAL FUEL COSTS (D + E)		1	\$32,296,542

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month	Ended:	November	2022

Α.	 Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant) Fuel (assigned cost during Forced Outage) 	(A)	2,583 5,158 0,104 0
	(0 KWH X \$0.000000)	(+)	0
	Fuel (substitute for Forced Outage)	(-)	0
B.	Sub-total Purchases Net Energy Cost - Economy Purchases Identifiable Fuel Cost - Other Purchases Identifiable Fuel Cost (substitute for Forced Outage) (0 KWH X \$0.000000) Purchase Adjustment for Peaking Unit Equivalent Sub-total	(+) (+) 26,299, (-) (-) 26,299,	0 ,506 0 0 (I)
C.	Inter-System Sales Fuel Costs	843,	,784
D.	SUB-TOTAL FUEL COST (A + B - C)	\$27,411,	,566
E.	Fuel-Related PJM Billing Line ItemsNovem	ber 2022 650,	,680
F.	GRAND TOTAL FUEL COSTS (D + E)	\$28,062,	246

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended: October 2022

A.	S 8	l owned plant)	Forced Outage)			(+) (+) (+) (+)	\$0 0 504,601 0
	(0	KWH X	\$0.000000)	(+)	0
	Fuel (substit	ute for Forced	Outage)			(-)	0
B.	Identifiable I Identifiable I (0		\$0.000000)	- (+) (+) (-) (-)	504,601 0 25,535,944 0 259,374 (1) 25,276,570
C.	Inter-System Sales	s Fuel Costs				_	486,785
D.	SUB-TOTAL I	FUEL COST (.	A + B - C)				\$25,294,386
E.	Fuel-Related PJM	Billing Line I	tems		October 2022		1,231,254
F.	GRAND TOTA	AL FUEL COS	STS (D + E)			=	\$26,525,640

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

September 2022

Month Ended:

A. Company Generation Coal Burned (+)\$2,857,099 Oil Burned (+)21,794 Gas Burned (+)214,751 Fuel (jointly owned plant) (+)0 Fuel (assigned cost during Forced Outage) 0 KWH X \$0.000000) ((+)0 Fuel (substitute for Forced Outage) (-) 0 Sub-total 3,093,643 B. Purchases Net Energy Cost - Economy Purchases (+)0 Identifiable Fuel Cost - Other Purchases 23,989,817 (+)Identifiable Fuel Cost (substitute for Forced Outage) (0 KWH X \$0.000000) (-) 0 Purchase Adjustment for Peaking Unit Equivalent (-) 904,634 (1) Sub-total 23,085,183 C. Inter-System Sales Fuel Costs 558,318 SUB-TOTAL FUEL COST (A + B - C) D. \$25,620,508 E. Fuel-Related PJM Billing Line Items September 2022 942,328 GRAND TOTAL FUEL COSTS (D + E) F. \$26,562,836

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

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FINAL FUEL COST SCHEDULE

Month Ended:

August 2022

A. Company Generation Coal Burned (+ Oil Burned (+ Gas Burned (+ Fuel (jointly owned plant) (+ Fuel (assigned cost during Forced Outage)	180,639 3,685,544
(0 KWH X \$0.000000) (+) 0
Fuel (substitute for Forced Outage) (-)0_
Sub-total B. Purchases Net Energy Cost - Economy Purchases Identifiable Fuel Cost - Other Purchases Identifiable Fuel Cost (substitute for Forced Outage) (0 KWH X \$0.000000) Purchase Adjustment for Peaking Unit Equivalent Sub-total) 23,032,256
C. Inter-System Sales Fuel Costs	6,942,408
D. SUB-TOTAL FUEL COST (A + B - C)	\$25,658,272
E. Fuel-Related PJM Billing Line Items August 2022	702,720
F. GRAND TOTAL FUEL COSTS (D + E)	\$26,360,992

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended:

July 2022

 A. Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant) Fuel (assigned cost during Forc 	ed Outage)	(+) (+) (+) (+)	\$6,222,777 761,315 4,148,223 0
(23,520,520	KWH X \$0.020823)	(+)	489,768
Fuel (substitute for Forced Outa	ige)	(-)	0
 B. Purchases Net Energy Cost - Economy Pur Identifiable Fuel Cost - Other P Identifiable Fuel Cost (substitut (23,520,520 Purchase Adjustment for Peakin 	urchases e for Forced Outage) KWH X \$0.093258)	(+) (+) (-) (-)	11,622,083 0 18,765,508 2,193,477 381,205 (1) 16,190,825
C. Inter-System Sales Fuel Costs			7,957,808
D. SUB-TOTAL FUEL COST (A + I	3 - C)		\$19,855,100
E. Fuel-Related PJM Billing Line Items		July 2022	1,294,706
F. GRAND TOTAL FUEL COSTS (D + E)	-	\$21,149,807

 As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended:

June 2022

 A. Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant) Fuel (assigned cost during Forced Outage) 	(+) (+) (+) (+)	\$4,813,016 282,674 5,142,690 0
(11,777,302 KWH X \$0.024810)	(+)	292,195
Fuel (substitute for Forced Outage)	(-)	0
Sub-total B. Purchases Net Energy Cost - Economy Purchases Identifiable Fuel Cost - Other Purchases Identifiable Fuel Cost (substitute for Forced Outage) (11,777,302 KWH X \$0.095904) Purchase Adjustment for Peaking Unit Equivalent Sub-total	(+) (+) (-) (-)	10,530,575 0 16,978,615 1,129,490 205,221 (1) 15,643,904
C. Inter-System Sales Fuel Costs		3,735,706
D. SUB-TOTAL FUEL COST (A + B - C)	2)	\$22,438,773
E. Fuel-Related PJM Billing Line Items June 2022		1,785,632
F. GRAND TOTAL FUEL COSTS (D + E)		\$24,224,405

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

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FINAL FUEL COST SCHEDULE

Month Ended:

May 2022

A. Company Generatio Coal Burned Oil Burned Gas Burned Fuel (jointly ov Fuel (assigned		ze)		(+) (+) (+) (+)	\$3,760,755 286,343 5,871,528 0
(0 KWH)	(+)	0
Fuel (substitute	e for Forced Outage)			(-)	0
Identifiable Fu Identifiable Fu (Sub-tota st - Economy Purchases el Cost - Other Purchases el Cost (substitute for For 0 KWH stment for Peaking Unit 1 Sub-tota	ced Outage) X \$0.000000 <mark>Equivalen</mark> t)	(+) (+) (-) (-)	9,918,625 0 15,750,416 0 254,887 (1) 15,495,529
C. Inter-System Sales F	uel Costs				3,534,222
D. SUB-TOTAL FU	EL COST (A + B - C)				\$21,879,933
E. Fuel-Related PJM B	illing Line Items		May 2022	-	219,971
F. GRAND TOTAL	FUEL COSTS (D + E)				\$22,099,904

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended:

April 2022

 A. Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant) Fuel (assigned cost during Forced Outage) 	(+ (+ (+ (+) 803,993) 3,496,190
(10,589,330 KWH X \$0.03371	5) (+) 357,019
Fuel (substitute for Forced Outage)	(-)	
Sub-total B. Purchases Net Energy Cost - Economy Purchases Identifiable Fuel Cost - Other Purchases Identifiable Fuel Cost (substitute for Forced Outage) (10,589,330 KWH X \$0.06781: Purchase Adjustment for Peaking Unit Equivalent Sub-total	(+) (+) 5) (-)	718,115
C. Inter-System Sales Fuel Costs		3,657,826
D. SUB-TOTAL FUEL COST (A + B - C)		\$17,882,566
E. Fuel-Related PJM Billing Line Items	April 2022	1,178,458
F. GRAND TOTAL FUEL COSTS (D + E)		\$19,061,024

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended:

March 2022

 A. Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant) 		(+) (+) (+) (+)	\$13,308 237,738 1,845,480 0
Fuel (assigned cost during Forced Outage)			
(44,653,340 KWH X	\$0.052097)	(+)	2,326,305
Fuel (substitute for Forced Outage)		(-)	0
Sub-total B. Purchases Net Energy Cost - Economy Purchases Identifiable Fuel Cost - Other Purchases Identifiable Fuel Cost (substitute for Forced (44,653,340 KWH X Purchase Adjustment for Peaking Unit Equi	\$0.052097)	(+) (+) (-) (-)	4,422,831 0 20,252,750 2,326,305 0 (1) 17,926,445
C. Inter-System Sales Fuel Costs			531,508
D. SUB-TOTAL FUEL COST (A + B - C)		,	\$21,817,768
E. Fuel-Related PJM Billing Line Items	March 2022	-	622,595
F. GRAND TOTAL FUEL COSTS (D + E)		:	\$22,440,362

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended:

February 2022

A.	Company Generation Coal Burned Oil Burned Gas Burned Fuel (jointly owned plant) Fuel (assigned cost during Forced Outage)	(+) (+) (+) (+)	\$2,309,154 198,958 2,304,586 0
	(33,162,710 KWH X \$0.008025)	(+)	266,131
	Fuel (substitute for Forced Outage)	(-)	0
	Sub-total		5,078,828
В.	Purchases	4.7.5	0
	Net Energy Cost - Economy Purchases Identifiable Fuel Cost - Other Purchases	(+) (+)	0 17,207,962
	Identifiable Fuel Cost (substitute for Forced Outage)		2001 CONTENDE ST. MCCOLONS 101
	(33,162,710 KWH X \$0.051087) Purchase Adjustment for Peaking Unit Equivalent	(-) (-)	1,694,183
	runchase Aujustinent for reaking omt Equivalent	(-)	51,220 (1)
	Sub-total		15,462,553
C.	Inter-System Sales Fuel Costs		1,157,620
D.	SUB-TOTAL FUEL COST (A + B - C)	3	\$19,383,761
E.	Fuel-Related PJM Billing Line Items February 2022	_	(116,223)
F.	GRAND TOTAL FUEL COSTS (D + E)	Ŧ	\$19,267,537

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

FINAL FUEL COST SCHEDULE

Month Ended:

January 2022

Α.	181 B	owned plant)	Forced Outage)			(+) (+) (+) (+)	\$5,947,315 231,661 6,920,528 0
	(0	KWH X	\$0.000000)	(+)	0
	Fuel (substitu	ute for Forced	Outage)			(-)	0
B.	Identifiable F Identifiable F (0		\$0.000000)	(+) (+) (-) (-)	13,099,504 0 13,275,976 0 665,115 (1) 12,610,862
C.	Inter-System Sales	Fuel Costs					5,655,213
D.	SUB-TOTAL F	FUEL COST (A + B - C)				\$20,055,154
E.	Fuel-Related PJM	Billing Line I	tems		January 2022		(525,969)
F.	GRAND TOTA	AL FUEL COS	STS (D + E)				\$19,529,185

(1) As calculated in accordance with KPSC Order dated October 3, 2002 in Case No. 2000-495-B, and as modified by the Commission's January 18, 2018 Order in Case No. 2017-00179.

	ame of Respondent: entucky Power CompanyThis report is: (1) ☑ An Original (2) □ A ResubmissionDate of Report: 04/12/2023Year/Period of Report End of: 2022/ Q4								
	SALES OF ELECTRICITY BY RATE SCHEDULES								
2. 3. 4	 Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Page 310. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and on ff peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of customers. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly). For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading. 								
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)			
1	Estimated								
2	General Service R	31	6,10	2 4	7,750	0.1968			
3	Outdoor Lighting R	23,460	6,565,84	7		0.2799			
4	Residential Load Management- Time-of-Day R	2,928	446,45	9 149	19,651	0.1525			
5	Residential Service R	1,931,059	308,825,95	3 132,462	14,578	0.1599			
6	Residential Service Time-of- Day R	92	14,18	3 4	23,000	0.1542			
7	Unrecovered R								
8	Kentucky Rider R		(1,859,638)					
41	TOTAL Billed Residential Sales	1,957,570	313,998,91	6 132,619	14,761	0.1604			
42	TOTAL Unbilled Rev. (See Instr. 6)	10,920	1,955,93	ט		0.1791			
43	TOTAL	1,968,490	315,954,84	5 132,619	14,843	0.1605			

	Iame of Respondent: (antucky Power CompanyThis report is: (1) I An Original (2) A ResubmissionDate of Report: 04/12/2023Year/Period of Report End of: 2022/ Q4							
		SALES OF ELEC	TRICITY BY RAT	E SCHEDULES				
2. 3. 4	 Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Page 310. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly). For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading. 							
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)		
1	Unrecovered C							
2	Kentucky Rider C		(1,479,149)				
3	Estimated C	(11)	(380)				
4	General Service C	595,619	105,363,95	2 29,685	20,065	0.1769		
5	Industrial General Service C	314,830	27,774,95	3 25	12,593,200	0.0882		
6	Large General Service C	395,902	57,939,82	1 483	819,673	0.1463		
7	Large General Service Time-of- Day C	4,961	632,76	6 4	1,240,250	0.1275		
8	Municipal WaterworksC	1,805	255,67	3 9	200,556	0.1416		
9	Outdoor Lighting C	14,459	3,374,69			0.2334		
10	Residential Service C	9	1,51	2 1	9,000	0.1680		
41	TOTAL Billed Small or Commercial	1,327,574	193,863,84	3 30,207	43,949	0.1460		
42	TOTAL Unbilled Rev. Small or Commercial (See Instr. 6)	17,362	2,161,53	9		0.1245		
43	TOTAL Small or Commercial	1,344,936	196,025,38	7 30,207	44,524	0.1458		

	of Respondent: cky Power Company			Date of Report: Year/Period of Re 04/12/2023 End of: 2022/ Q4				
		SALES OF ELEC	TRICITY BY RAT	E SCHEDULES				
2. 3. 4	 Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Page 310. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly). For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading. 							
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)		
1	Contract Service – Interruptible Power I	231,478	16,824,76	7 8	28,934,750	0.0727		
2	Estimated I	1,905	2,318,44	3		1.2170		
3	General Service I	25,341	4,367,97	3 910	27,847	0.1724		
4	Industrial General Service I	1,711,654	146,448,194	4 35	48,904,400	0.0856		
5	Large General Service I	89,706	14,095,970	6 94	954,319	0.1571		
6	Large General Service Time-of- Day I	3,135	402,25	2 2	1,567,500	0.1283		
7	Outdoor Lighting I	752	163,87	7		0.2179		
8	Unrecovered I							
9	Kentucky Rider I		(1,267,723)				
41	TOTAL Billed Large (or Ind.) Sales	2,063,971	183,353,769	9 1,049	1,967,561	0.0888		
42	TOTAL Unbilled Rev. Large (or Ind.) (See Instr. 6)	4,513	552,12	9		0.1223		
43	TOTAL Large (or Ind.)	2,068,484	183,905,898	3 1,049	1,971,863	0.0889		

	of Respondent: cky Power Company	This report is: (1) ☑ An Original (2) □ A Resubmis	sion	Date of Report: 04/12/2023	Year/Period of F End of: 2022/ Q	
		SALES OF ELEC	TRICITY BY RAT	E SCHEDULES		
2. 3. 4. 5.	Report below for each rate schedule average Kwh per customer, and ave Provide a subheading and total for e Revenues," Page 300. If the sales u sales data under each applicable re Where the same customers are sen general residential schedule and an the duplication in number of reported The average number of customers s during the year (12 if all billings are For any rate schedule having a fuel Report amount of unbilled revenue a	erage revenue per Kv each prescribed oper- nder any rate schedu venue account subhe ved under more than off peak water heatin d customers. should be the number made monthly). adjustment clause st	wh, excluding date ating revenue accu- ule are classified in eading. one rate schedule ng schedule), the o r of bills rendered ate in a footnote th	for Sales for Resale whi ount in the sequence foll in more than one revenue in the same revenue ac entries in column (d) for during the year divided b ne estimated additional r	ich is reported on Pa owed in "Electric Op a account, List the ra count classification the special schedule by the number of billi evenue billed pursua	ige 310. erating te schedule and (such as a should denote ng periods
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)
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41	TOTAL Billed Commercial and Industrial Sales			
42	TOTAL Unbilled Rev. (See Instr. 6)			
43	TOTAL			
		•		

	of Respondent: cky Power Company			Date of Report: 04/12/2023	Year/Period of R End of: 2022/ Q4				
	SALES OF ELECTRICITY BY RATE SCHEDULES								
2. 2. 3. \ 4 5.	 Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Page 310. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and on ff peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of customers. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly). For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading. 								
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)			
1	Estimated								
2	General Service	822	221,50	7 255	3,224	0.2695			
3	Outdoor Lighting	108	38,49	2		0.3564			
4	Street Lighting	8,436	1,928,88	5 54	156,222	0.2286			
5	Unrecovered								
6	Kentucky Rider		2	9					
41	TOTAL Billed Public Street and Highway Lighting	9,366	2,188,91	3 309	30,311	0.2337			
42	TOTAL Unbilled Rev. (See Instr. 6)	22	4,37	7		0.1990			
43	TOTAL	9,388	2,193,29	0 309	30,382	0.2336			

	of Respondent: cky Power Company	This report is: (1) ☑ An Original (2) □ A Resubmis	sion	Date of Report: 04/12/2023	Year/Period of F End of: 2022/ Q4				
		SALES OF ELEC	TRICITY BY RAT	E SCHEDULES					
2. 3. 4. 5.	 Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Page 310. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly). For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading. 								
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)			
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34	32				
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39 Image: Constraint of the sector of the	37				
40 Image: Constraint of the sector of the	38				
41 TOTAL Billed Provision For Rate Refunds Image: Constraint of the sector of the sec	39				
41 Rate Refunds 42 TOTAL Unbilled Rev. (See Instr. 6)	40				
	41	TOTAL Billed Provision For Rate Refunds			
	42	TOTAL Unbilled Rev. (See Instr. 6)			
43 TOTAL 5,999,074	43	TOTAL	5,999,074		

Name of Respondent: Kentucky Power CompanyThis report is: (1) I An Original (2) A ResubmissionDate of Report: 04/12/2023Year/Period of Report End of: 2022/ Q4							
		SALES OF ELEC	TRICITY BY RATE	SCHEDULES			
2. 2. 3. \ 4 5.	 Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Page 310. Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading. Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and an off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported customers. The average number of customers should be the number of bills rendered during the year divided by the number of billing periods during the year (12 if all billings are made monthly). For any rate schedule having a fuel adjustment clause state in a footnote the estimated additional revenue billed pursuant thereto. Report amount of unbilled revenue as of end of year for each applicable revenue account subheading. 						
Line No.	Number and Title of Rate Schedule (a)	MWh Sold (b)	Revenue (c)	Average Number of Customers (d)	KWh of Sales Per Customer (e)	Revenue Per KWh Sold (f)	
41	TOTAL Billed - All Accounts	5,358,481	693,405,446	164,184	2,056,581		
42	TOTAL Unbilled Rev. (See Instr. 6) - All Accounts	32,817	4,673,975				

TOTAL - All Accounts

43

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^(a)698,079,421

164,184

2,056,581

5,391,298

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Name of Respondent: Kentucky Power Company (1		iis report is:)	Date of Report: 04/12/2023	Year/Period of Report End of: 2022/ Q4
		FOOTNOTE	DATA	
(a) Concept: Re	venueFromSalesOfElectricity	3vRateSchedulesIncludingU	nbilledRevenue	
FUEL CLAUSE	,	, 3-		
Account	DESCR		Total	
4400 RES	Estimated		-	
	General Service		898	
	Outdoor Lighting		566,630	
	Residential Load Management	-Time-of-Day	65,951	
	Residential Service	,	44,323,354	
	Residential Service Time-of-Da	Ŋ	2,128	
	Unbilled		572,343	
	Unrecovered		-	
4400 RES Total			45,531,305	
4420 COM	Estimated		356	
	General Service		14,066,827	
	Industrial General Service		8,198,064	
	Large General Service		9,415,826	
	Large General Service Time-of-Day		119,153	
	Municipal Waterworks		42,634	
	Outdoor Lighting		352,272	
	Residential Service		212	
	Unbilled		729,575	
	Unrecovered		-	
4420 COM Total			32,924,920	
4420 IND	Contract Service – Interruptib	e Power	2,261,351	
	Estimated		1,951,171	
	General Service		587,592	
	Industrial General Service		39,033,663	
	Large General Service		2,123,564	
	Large General Service Time-of	-Day	65,337	
	Outdoor Lighting		18,223	
	Unbilled		210,287	
	Unrecovered		-	
4420 IND Total			46,251,188	
4440 PUB	Estimated		-	
	General Service		19,737	
	Outdoor Lighting		2,636	
	Street Lighting		203,812	
	Unbilled		910	
	Unrecovered			
4440 PUB Total			227,095	
Grand Total			124,934,507	