#### **BOEHM, KURTZ & LOWRY**

# 36 EAST SEVENTH STREET, SUITE 1510 CINCINNATI, OHIO 45202

## TELEPHONE (513) 421-2255

### **VIA E-FILING**

December 22, 2023

Linda Bridwell, Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: In The Matter Of: Electronic Application Of Kentucky Power Company For (1) A General Adjustment Of Its Rates For Electric Service; (2) Approval Of Tariffs And Riders; (3) Approval Of Accounting Practices To Establish Regulatory Assets And Liabilities; (4) A Securitization Financing Order; And (5) All Other Required Approvals And Relief—Case No. 2023-00159

Dear Ms. Bridwell:

Please find attached the BRIEF OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC. for e-filing today in the above-referenced docket.

By copy of this letter, all parties listed on the attached Certificate of Service have been served. Please place this document(s) of file.

Very Truly Yours,

/s/ Michael L. Kurtz
Michael L. Kurtz, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY

MLKkew

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail (unless otherwise noted) this 22<sup>ND</sup> day of December, 2023 to the following:

<u>/s/ Michael L. Kurtz</u>
Michael L. Kurtz, Esq.
Jody Kyler Cohn, Esq.

Angela M Goad Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue, Suite 20 Frankfort, KENTUCKY 40601-8204

Ashley Wilmes Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KENTUCKY 40602

Byron Gary Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KENTUCKY 40602

Carrie H Grundmann Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NORTH CAROLINA 27103

Christen M Blend American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Post Office Box 16631 Columbus, OHIO 43216

Cassandra McCrae Earthjustice 1617 JFK Boulevard, Suite 1675 Philadelphia, PENNSYLVANIA 19103

Thomas J FitzGerald Counsel & Director Kentucky Resources Council, Inc. Post Office Box 1070 Frankfort, KENTUCKY 40602

Hector Garcia Santana American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Post Office Box 16631 Columbus, OHIO 43216 Hema Lochan Earthjustice 48 Wall Street, 15th Floor New York, NEW YORK 10005

Joseph Fichera Senior Managing Director & CEO Saber Partners, LLC 260 Madison Avenue 8th Floor New York, NEW YORK 10016

John Horne Office of the Attorney General Office of Rate 700 Capitol Avenue, Suite 20 Frankfort, KENTUCKY 40601-8204

Kenneth J Gish, Jr. Stites & Harbison 250 West Main Street, Suite 2300 Lexington, KENTUCKY 40507

Katie M Glass Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634

Honorable Kimberly S McCann VanAntwerp Attorneys, LLP 1544 Winchester Avenue, 5th Floor P. O. Box 1111 Ashland, KENTUCKY 41105-1111

Lawrence W Cook Assistant Attorney General Office of the Attorney General Office of Rate 700 Capitol Avenue, Suite 20 Frankfort, KENTUCKY 40601-8204

Michael West Office of the Attorney General Office of Rate 700 Capitol Avenue, Suite 20 Frankfort, KENTUCKY 40601-8204 Megan W Mullins Spilman Thomas & Battle, PLLC 300 Kanawha Blvd, East Charleston, WEST VIRGINIA 25301

Steven W Lee Spilman Thomas & Battle, PLLC 1100 Brent Creek Blvd., Suite 101 Mechanicsburg, PENNSYLVANIA 17050

Thomas Cmar Earthjustice 6608 Wooster Pike Cincinnati, OHIO 45227

Tanner Wolffram American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Post Office Box 16631 Columbus, OHIO 43216