COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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)	Case No. 2023-00159
Regulatory Assets And Liabilities; (4) A)	
Securitization Financing Order; And (5) All Other)	
Required Approvals And Relief)	

Kentucky Power Company's Motion to Suspend Financing Order Deadline

Kentucky Power Company ("Kentucky Power" or the "Company") respectfully moves the Public Service Commission of Kentucky ("Commission") to suspend the deadline to "provide a proposed time and responsibility schedule specifying key dates and milestones and where meetings may occur" "within 10 days after the issuance of this Financing Order" found in Section V, ordering paragraphs 29 and 30 of the order dated January 10, 2024 granting Kentucky Power's application for a securitization financing order ("Financing Order").

Kentucky Power is appreciative of the Commission's thorough review of the Company's application and the Commission's grant of approval to securitize the regulatory assets requested for the benefit of Kentucky Power's customers. Kentucky Power is eager to continue the process in order to pass those benefits back to customers as soon as possible, and is working diligently to review and process the requirements of the Financing Order.

Kentucky Power has initially identified some issues within the Financing Order of which Kentucky Power intends to seek rehearing or clarification. The request for clarification will include aspects related to, or that may have an effect on, the requirement to "provide a proposed time and responsibility schedule specifying key dates and milestones and where meetings may occur"

"within 10 days after the issuance of this Financing Order." Due to the need for clarification of this and other aspects of the Financing Order, Kentucky Power presently is unable to propose the time and responsibility schedule as ordered. Kentucky Power therefore respectfully requests that the requirement to provide the time and responsibility schedule be suspended until after a final order is issued on Kentucky Power's forthcoming Motion for Rehearing.

Kentucky Power intends to file a timely Motion for Rehearing in accordance with KRS 278.400 that identifies each of the issues for which Kentucky Power seeks to clarify. Additional detail will be provided in Kentucky Power's forthcoming Motion for Rehearing, and the Company also will request that the Financing Order be clarified or amended as proposed in this motion.

WHEREFORE, Kentucky Power Company respectfully requests the Commission enter an Order:

- 1. Suspending the deadline to "provide a proposed time and responsibility schedule specifying key dates and milestones and where meetings may occur" "within 10 days after the issuance of this Financing Order" found in Section V, ordering paragraphs 29 and 30 of the Financing Order until after the rehearing deadline in KRS 278.400 has passed and a final rehearing order is issued; and
 - 2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,

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