**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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| Electronic Application Of Kentucky Power Company For: (1) Approval To Expand Its Targeted Energy Efficiency Program; (2) Approval Of A Home Energy Improvement Program And A Commercial Energy Solutions Program; (3) Authority To Recover Costs And Net Lost Revenues, And To Receive Incentives Associated With The Implementation Of Its Demand-Side Management/Energy Efficiency Programs; (4) Approval Of Revised Tariff D.S.M.C.; (5) Acceptance Of Its Annual DSM Status Report; And (6) All Other Required Approvals And Relief | ) | Case No. 2024-00115 |

**REBUTTAL TESTIMONY OF**

**TANNER S. WOLFFRAM**

**ON BEHALF OF KENTUCKY POWER COMPANY**

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**CASE NO. 2024-00115**

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**CASE NO. 2024-00115**

## I. INTRODUCTION

**Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.**

A. My name is Tanner S. Wolffram. My position is Director- Regulatory Services for Kentucky Power Company ("Kentucky Power" or the "Company"). My business address is 1645 Winchester Avenue, Ashland, Kentucky 41101.

**Q. ARE YOU THE SAME TANNER S. WOLFFRAM THAT ADOPTED THE DIRECT TESTIMONY OF SCOTT E. BISHOP IN THIS PROCEEDING?**

A. Yes, I am.

## II. PURPOSE OF REBUTTAL TESTIMONY

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS PROCEEDING?**

A. The purpose of my rebuttal testimony is to rebut Joint Intervenors ("JI") Witness Sherwood's recommendations to expand or modify the DSM Plan proposed by Kentucky Power in this proceeding. Additionally, my rebuttal testimony will demonstrate that the recommendations made by JI Witnesses Sherwood and Harris are premature and unsupported by any evidence indicating they would provide benefits in excess of the costs to the Company's customers.

**Q. AT A FUNDAMENTAL LEVEL, DO THE JOINT INTERVENORS AGREE THE COMPANY'S DSM PLAN SHOULD BE APPROVED?**

A. Yes. Joint Intervenors Witness Sherwood agrees the Company's proposal should be approved.[1] It is important to note that the proposals in this proceeding have always been viewed as a first step in the Company's overall DSM strategy. As explained in its direct case, the Company is proposing new DSM programs for the first time since the Commission discontinued nearly all the Company's DSM programs in 2018. Given that the Company is proposing additional DSM programs for the first time in approximately six years, the Company made the decision to select a targeted suite of programs that were forecasted to be cost-effective and that balanced the rate impacts to customers. Starting from this targeted set of DSM programs also has the benefit of providing the Company insight into customers' level of participation and interest in DSM before further potential expansion is explored. If the proposed suite of programs shows significant interest and proves to be cost-effective, the Company would consider adding additional programs or expanding its proposed programs in the future.

Despite the Company's reasonable approach, both Ms. Sherwood and Mr. Harris go on to recommend various premature and unsupported changes to the Company's DSM proposals in this case. The Commission should instead approve the Application as filed.

[1] Sherwood Direct at 4 ("I support the Company's proposal to expand the DSM plan beyond the TEE program and creating new opportunities for its customers to benefit from these critical cost-savings programs.").

## III. <u>THE COMPANY'S DSM PLAN IS REASONABLE, MEETS THE STATUTORY STANDARDS FOR APPROVAL, AND SHOULD BE APPROVED AS FILED</u>

**Q. PLEASE EXPLAIN MS. SHERWOOD'S AND MR. HARRIS' RECOMMENDED MODIFICATIONS TO THE COMPANY'S DSM PROPOSED DSM PORTFOLIO.**

A. First, Ms. Sherwood claims that the plan does not provide programs that are available, affordable, and useful to customers.[2] Second, Witness Sherwood takes issue with the Company's proposed cost recovery method. Specifically, she claims that the Commission should limit recovery of net lost revenues to one year and only include savings related to the DSM investment.[3] She also recommends the Commission modify the incentive mechanism to be based on achievement threshold of savings as opposed to the current shared savings methodology, which is limited to 15% of the net savings associated with the programs.[4] Finally, Witness Sherwood appears to insinuate that the Company's proposal is not consistent with its most recent IRP.[5]

In addition to Ms. Sherwood's recommendations, Witness Harris suggests the Commission require the Company to convene an Inclusive Utility Investment ("IUI") working group to develop and file for approval of an IUI program within twelve months of the Order in this proceeding.[6]

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[2] Id. at 11.
[3] Id. at 10.
[4] Id. at 56.
[5] Id. at 10.
[6] Harris Direct at 3.

**a. The Company's DSM programs are available, affordable, and useful.**

**Q. ARE THE PROPOSED DSM PROGRAMS AVAILABLE, AFFORDABLE, AND USEFUL TO CUSTOMERS?**

A. Yes. As explained in the Company's direct testimony, its DSM Plan provides additional incentives for income-qualified customers via the proposed expansion of its the Targeted Energy Efficiency ("TEE") Program, adds an additional residential program to promote energy efficiency improvements and provide financial incentives and assessment for implementing eligible energy efficiency measures, and adds a commercial program that provides energy audits and financial incentives for qualifying energy-efficient improvements and technologies. The Company's proposals in this case accomplish these goals and provide customer benefits while resulting in a monthly bill increase of only $0.56 per month for the average residential customer.

Witness Sherwood seems to agree that these programs are useful to customers.[7] Ms. Sherwood seemingly takes issue with the availability and affordability of the programs as she claims that the Company's programs, "do not provide the proper level of incentives and lack financing opportunities or connection for participants to overcome the cost barrier of investing in energy efficiency…."[8]

First, as the Company explained in response to JI 1-35,

> [t]he [Home Energy Improvement Plan ("HEIP")] will be available to all residential tariff customers while program funds are available regardless of renter/owner status, housing type, or location of the home inside the Company's territory. The Commercial Energy Solutions Program will be available to all commercial class customers in the Company's service territory while program funds are available.

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[7] Sherwood Direct at 4.
[8] Id. at 11.

Additionally, as explained above, the TEE Program will be expanded to serve additional income-qualified customers. In fact, Witness Sherwood, compliments the Company's proposal to expand the TEE Program as it "provide[s] supplemental funds to assist with eliminating health and safety barriers for homes to participate in the WAP…."[9] As such, the evidence is clear that Company's proposed DSM programs are made appropriately available and useful to customers.

The crux of Witness Sherwood's argument here is that the Company should add additional programs and incentives to expand the availability of its DSM programs. To that end, she recommends a variety of changes to the Company's DSM proposals, including a requirement the Company develop a three-year plan that ramps up to achieve 0.2% of annual energy efficiency savings as a percent of 2022 sales, explore financing opportunities and identify financing partners to support energy efficiency projects, develop a new manufactured housing pilot during the three-year plan, reassess the budget levels for the TEE Program, expand HEIP to provide enhanced rebates for low-to-moderate income customers, and provide enhanced rebates for small business customers under the Commercial Energy Solutions Program ("CESP").[10] Witness Harris also recommends that the Company be required to analyze and propose an IUI program within 12 months of a final order being issued in this proceeding.[11] These recommendations are unsupported and premature.

[9] Id. at 25.
[10] Id. at 6-7.
[11] Harris Direct at 36.

**Q. WHAT ARE THE OVERARCHING CONCERNS WITH THE RECOMMENDATIONS MADE BY THE JOINT INTERVENOR WITNESSES?**

A. First, neither Witness Sherwood nor Witness Harris provide any specific recommendations on the appropriate amount of the additional incentives they claim are necessary, or the costs of these additional programs/incentives. This is problematic and short-sighted. Each of the recommendations to expand or provide additional incentives would add some additional cost to the Company's proposal that would be paid by all the Company's customers (other than industrial customers).

Further, neither provide any evidence that their recommendations would be cost-effective. Conversely, the proposed DSM Plan is supported by a formal cost-benefit analysis that demonstrates the portfolio of proposed DSM programs would be a net benefit to customers. The Company was intentional in the programs it selected and therefore is not asking its customers to pay for unproven, unsupported DSM programs.

**Q. IS A REQUIREMENT THAT THE COMPANY ACHIEVE 0.2% ANNUAL ENERGY EFFICIENCY SAVINGS REASONABLE OR NECESSARY?**

A. No. As quantified by Witness Sherwood, her recommendation would require the Company to achieve 10,587 MWh of energy efficiency savings per year.[12] This would effectively triple the required energy savings as compared to what the Company has proposed. Ms. Sherwood does not provide specific recommendations regarding what

[12] Sherwood Direct at 23.

programs would need to be added and/or how much the proposed programs would need to be expanded to achieve that level of savings (if the Company could even realistically achieve that level), whether the programs necessary to achieve that level of savings would be cost-effective, or what the cost to customers to achieve that level of savings would be. The only basis for the level she recommends is her unsupported opinion that the amount is more in-line with the achievable potential for programs that were included in the Company's Market Potential Study. However, neither Ms. Sherwood nor the Joint Intervenors conducted their own Market Potential Study. Nor were the things that Ms. Sherwood recommends supported by the Company's MPS. Consistent with the theme of the Company's filing, the MPS proposes in this proceeding an incremental approach to determine customer demand for DSM and to avoid a large increase in the DSM surcharge. As such, there is no independent basis to support the 0.2% requirement Ms. Sherwood proposes and it therefore should be rejected.

**Q. DOES WITNESS SHERWOOD PROVIDE ANY BASIS FOR HER RECOMMENDATION THAT THE COMPANY SHOULD BE REQUIRED TO EXPLORE FINANCING OPPORTUNITIES AND IDENTIFY FINANCING PARTNERS TO SUPPORT ENERGY PROJECTS?**

A. Witness Sherwood appears to claim this is necessary step is necessary to make the Company's proposed programs available to customers.[13] However, this claim is otherwise unsupported. In fact, in direct opposition to her claim, as the Company demonstrated in discovery, its current DSM program has a waitlist for customers to

[13] Id. at 11.

participate.[14] Expanding the TEE Program as proposed would allow additional customers to participate, thereby preparing those customers' homes for additional measures they could be eligible to receive as part of HEIP in the future. Also, like her recommendation related to the 0.2% savings target, she provides no evidence as to the costs of these additional financing opportunities, nor does she identify financing partners, or that doing so would promote a cost-effective DSM portfolio. As such, this recommendation should be similarly rejected.

**Q. DOES THE COMPANY BELIEVE A NEW MANUFACTURED HOUSING PROGRAM IS APPROPRIATE AT THIS TIME?**

A. No, not currently. As explained in response to JI 1-47, customers with manufactured housing would be eligible to participate in the Company's proposed HEIP program. Also, again, there is no evidence that a new manufactured home program would be cost-effective or a quantification of the costs to customers to develop and implement such a program. As such, that recommendation is premature at this point. However, to the extent customers participate in the Company's HEIP program and there is a demonstrated need to expand DSM offerings, the Company would be open to evaluating such a program in the future.

[14] Kentucky Power's Response to JI 2-16.

**Q. WITNESS SHERWOOD ALSO RECOMMENDS THE COMPANY WORK WITH THE COMMUNITY ACTION AGENCIES TO REASSESS THE SUFFICIENCY OF ITS FUNDING CONTRIBUTION.[15] DO YOU BELIEVE THE COMPANY HAS ALREADY SATISFIED THIS RECOMMENDATION?**

A. Yes. The Company has reiterated that the level of TEE Program funding was determined based on collaboration with the CAAs.[16] Additionally, the Company is in regular communication with the CAAs to ensure the budget levels are consistent with the level of agency staffing and availability. As such, this recommendation was already met and the Company's proposed funding contribution level is reasonable.

**Q. DO YOU HAVE ANY CONCERNS WITH WITNESS SHERWOOD'S RECOMMENDATIONS REGARDING THE TEE PROGRAM?**

A. Yes. Witness Sherwood recommends that the Company be required to target and prioritize customers with baseboard heating.[17] This recommendation is flawed for multiple reasons. First, the Company's TEE Program provides supplemental funding to the Department of Energy's ("DOE") Weatherization Assistance Program, which is administered by the CAAs. As such, it is ultimately the CAA's decision as to whether they would target and prioritize baseboard heating, and not the Company's. Additionally, as the Company explained in response to JI 1-42, the issue is not that the CAAs do not prioritize customers with baseboard heating, the issue is that baseboard heating without central ductwork being installed may not pass the cost-effectiveness tests under the DOE's Weatherization Assistance Program guidelines to qualify for

[15] Sherwood Direct at 6.
[16] Kentucky Power's Response to JI 2-24.
[17] Sherwood Direct at 6.

TEE funding. This is why the Company proposed to add incentives for ductless heat pumps.

**Q. DO YOU AGREE WITH WITNESS SHERWOOD'S RECOMMENDATIONS SPECIFIC TO THE PROPOSED HEIP PROGRAM?**

A. No. First, Witness Sherwood suggests the Company expand the offerings in HEIP to include non-centralized air conditioners and dehumidifiers.[18] As the Company explained in Direct Testimony of Company Witness Nolen, the HEIP proposal does include Energy Star room air conditions that are non-central A/C units.[19] As such, the Company's proposals already consider this recommendation.

Next, although Witness Sherwood supports the Company's HEIP proposal, she recommends the Company be required to provide enhanced rebates for low-to-moderate income customers.[20] The Company purposefully designed the HEIP to be available to all residential customers because the TEE Program currently assists income-qualified customers, which is something Witness Sherwood acknowledges would help eliminate a barrier for those customers who receive TEE funding to participate in HEIP in the future.[21] Additionally, although she recommends providing an increased rebate or adding another measure to the program, she provides no specific recommendation on the amount of the rebates, how much those additional measures will cost customers, or whether such rebates would be cost-effective. This is equally true of her proposal to require all smart thermostats rebated as part of HEIP to be

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[18] Id.
[19] Nolen Direct at 16.
[20] Sherwood Direct at 7.
[21] Id. at 32.

demand-response capable and, as such, both recommendations should be rejected. However, were the Company to see a large demand for these types of products and participation in the future, it would, again, be willing explore these recommendations to the extent they are cost-effective and beneficial for customers.

**Q. DO YOU BELIEVE THE RECOMMENDATIONS RELATED TO THE COMPANY'S COMMERCIAL ENERGY SOLUTIONS PROGRAM ("CESP") ARE NECESSARY?**

A. Again, no. The recommendation would add additional costs to the Company's proposal without any evidentiary support other than anecdotal discussion that it would provide benefits to customers. Conversely, the Company's CESP is supported by a formal cost-benefit analysis that demonstrates the program is a net benefit to customers. Ms. Sherwood provides no such evidence as to her recommendations and, as such, this recommendation should also be rejected.

**Q. DOES THE COMPANY BELIEVE IT WOULD BE APPROPRIATE TO DEVELOP AN IUI PROGRAM FOR ITS SERVICE TERRITORY AT THIS POINT?**

A. No. First, there is no evidence that this program would be cost-effective in the Commonwealth. In fact, the Company's MPS found that Pay As You Save ("PAYS") programs activity has not consistently demonstrated that they can be cost effective or that they can effectively reach the target market. Mr. Harris takes issue with this finding despite the actual data from Ameren Missouri's PAYS program showing a TRC test score of 0.68. He goes on to claim that those scores have improved but then relies on estimates for 2025 through 2027 to support his claim even though, within that time period, the TRC still shows the program is not cost effective (0.98 TRC score in 2025).[22]

Additionally, although Witness Harris states that customers who participate in IUI programs will pay for the investment, he acknowledges the Company's other customers would pay the costs associated with administering and marketing the program.[23] If the Company were to follow the Duke North Carolina model, the Company's customers would be responsible for a return on and of the capital deployed to allow participating individual customers to make these investments.[24] As the Company explained in its most recent base case in relation to the JI's proposal for a PAYS program, the Company is not in a position financially to outlay the capital to support individual customers' behind-the-meter energy efficiency measures. Asking the Company to outlay capital and requiring customers to pay a return on and of that capital without proven cost-effectiveness is putting the cart before the horse, especially given there is no real indication or insight as to the market for such a program within the Company's service territory. As such, it would be more prudent to implement the Company's proposals in this proceeding first. Mr. Harris seems to recognize this fact as he states:

> "[t]he Weatherization Readiness Funds and supplemental funding from KPC should be the first stop for income-eligible customers, and it is best that they receive these resources at no cost if there are funds available to do so."[25]

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[22] Id. at 35.
[23] Harris Direct at 6.
[24] Id. at 10 ("An IUI program will need a capital provider, and that provider will need to be able to earn an appropriate return on that capital. Duke Energy NC decided to invest its own capital through its IUI programs. Duke has received approval for recovering IUI investments including a recovery of its pre-tax weighted average cost of capital ("WACC") determined in its most recent rate case through its IUI program.").
[25] Id. at 31.

Therefore, Mr. Harris' recommendation that the Company should evaluate IUI programs and within 12 months of an order in this proceeding should be rejected.

**b. The Company's DSM cost-recovery mechanism is reasonable and has been consistently approved by the Commission.**

**Q. IS A MODIFICATION TO THE COMPANY'S COST-RECOVERY MECHANISM FOR ITS PROPOSED DSM PROGRAMS WARRANTED?**

A. No. It is important to note that the Company proposed in this proceeding no modifications to how it calculates the DSM surcharge, net lost revenues, or its shared savings methodology. The Commission has reviewed and approved the Company's current DSM mechanism as-is since at least 2018.

As it relates to the calculation of net lost revenues, the Company has historically limited the recovery of net lost revenues to a maximum of three years absent an intervening base rate case. Witness Sherwood does not dispute that the Commission has historically approved recovery of net lost revenues for a maximum of three years absent an intervening rate case not only for the Company, but also for other investor-owned utilities ("IOU") in the Commonwealth. For example, with respect to Louisville Gas and Electric Company's DSM mechanism, "[r]ecovery of revenue from lost sales calculated for a twelve-month period shall be included in the DRLS for thirty-six (36) months or until implementation of new rates pursuant to a general rate case, whichever comes first."[26] Despite this precedent, Witness Sherwood claims, in Table 2 to her Direct Testimony, that the recovery of net lost revenue should be limited to one year.[27]

[26] Louisville Gas & Electric Company, P.S.C. Electric No. 13, Original Sheet No. 86.1.
[27] Sherwood Direct at 10.

She provides no other basis for such a deviation from Commission precedent. Given this precedent and the lack of evidence supporting why the change should otherwise be made, the Commission should reject this recommendation.

**Q. DO YOU AGREE WITH WITNESS SHERWOOD'S RECOMMENDATION THAT THE COMPANY'S SHARED-SAVINGS INCENTIVE BE MODIFIED?**

A. No. Like her argument regarding the calculation of net lost revenues, Witness Sherwood proposes a deviation from the Company's long-standing, and the Commonwealth's generally accepted, shared-savings mechanism. As previously explained, the Company is proposing to continue its long-established efficiency incentive structure, which is defined as 15 percent of the estimated net savings associated with the programs. Witness Sherwood claims that the shared-savings incentive should be based on the achievement of various goals rather than a percentage of net savings, and she recommends setting the threshold for the Company to receive its incentive upon achieving 75% to 125% of the approved energy and demand savings in the program year.[28]

However, Witness Sherwood provides no basis for these threshold numbers other than a reference to Connecticut DSM requirements. Further, her analysis ignores the fact that both the other electric IOUs in the Commonwealth (LG&E/KU and Duke)

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[28] Id. at 54.

have the same shared savings mechanism.[29] Additionally, the model that Witness Sherwood proposes would effectively disincentivize the Company from managing its DSM programs in a manner that best serves its customers. Ms. Sherwood's recommended performance incentive would incentivize the Company to achieve the savings threshold amount with no regard to the costs because the incentive to the utilities in having the DSM programs would only be realized upon achievement of at least that threshold amount. Conversely, the current shared-savings mechanism incentivizes the Company to spend on and manage its DSM programs in a manner that achieves the maximum level of benefits to its customers while managing the cost to customers.

For example, in a scenario where the Company would be required to achieve the 75% threshold to receive its shared-saving incentive, if the Company would have already spent its program budget for that year but had not met its savings threshold, then the Company would be incentivized to increase its spending beyond its budget to achieve that savings threshold. This could increase the cost to customers, and the customer would still only be receiving 75% of the benefits associated with the programs. However, under the current model, in that same situation, the Company would not be incentivized to spend over its budget; instead, it would be incentivized to manage the program most efficiently to customers benefit because it receives its

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[29] LG&E P.S.C. Electric No. 13, Original Sheet No. 86.2 ("For all Energy Efficiency Programs, the DSMI shall be computed by multiplying the net resource savings expected from the approved programs that are to be installed during the upcoming twelve-month period times fifteen (15) percent, not to exceed five (5) percent of program expenditures"); Duke Kentucky KY.P.S.C. Electric No. 2 Third Revised Sheet No. 75, page 3 of 4 ("The DSM Program Incentive (PI) amount shall be computed by multiplying the net resource savings expected from the approved programs which are to be installed during the upcoming twelve-month period times fifteen (15) percent.")

shared-savings incentive based on the net savings of the programs achieved regardless of the amount of savings actually realized. If the Company achieves less than its projected savings, then it receives less of an incentive and/or, if the Company determines the best course of action is to reduce spending on the program because it is under-performing, then customers will receive a credit to the DSM surcharge when it is updated in the Company's next annual filing. The Company believes structuring the incentive consistent with current practice is best; it allows the utility to manage its DSM programs to the benefit of customers rather than focusing on achieving its savings targets without consideration of the cost to customers.

Therefore, the Commission should reject JI's proposal to change the shared-savings incentive to a performance-based measure because it is inconsistent with Commission precedent and sends the wrong signal to utilities deploying DSM programs.

**c. The Company's DSM Plan is consistent with its most recent IRP.**

**Q. IS THE COMPANY'S DSM PROPOSAL INCONSISTENT WITH ITS MOST RECENTLY FILED (2022) IRP?**

A. No. Witness Sherwood appears to acknowledge that the Company's DSM proposals are consistent with the Company's 2022 IRP. She notes that the Company made clear in its 2022 IRP proceeding that it did intend offer DSM programs, even though they were not initially included in its IRP.[30] Thus, Ms. Sherwood appears to take issue with the fact that the Company did not propose all of the programs analyzed in the Market

[30] Sherwood Direct at 10.

Potential Study provided in the Company's 2022 IRP proceeding. However, that fact does not mean that Company's proposed DSM programs are inconsistent with the IRP. In fact, Witness Sherwood points out that the Company made clear in the IRP proceeding when it provided the MPS that it did not know, at that time, the level of investment or type of DSM proposals it would ultimately propose.[31] Consistent with its statements in the IRP, the Company filed this Application for DSM programs after the MPS and the Company's analysis as to which programs to propose was completed.

**Q. WITNESS SHERWOOD AND HARRIS ALSO MAKE VARIOUS RECOMMENDATIONS AS TO FUTURE COLLABORATION BETWEEN THE COMPANY AND THE JIs. IS THE COMPANY OPEN TO FUTURE COLLABORATION REGARDING DSM IN THE FUTURE?**

A. Yes. However, the Company does not believe that the specific recommendations made by Witnesses Sherwood and Harris are necessary at this time. Specifically, as explained above, the Company does not believe collaboration on an IUI program would be useful. There is no evidence that these types of programs are cost-effective nor is there any demonstrated desire for such programs from the Company's customers. The Company should instead focus its time and efforts on other possibilities that are more beneficial to customers.

Additionally, Witness Sherwood recommends the Commission direct the Company to start in-person workshops earlier in the process in developing its next DSM Plan.[32] It is important to note that the timing of the in-person workshops that were

[31] Id.
[32] Sherwood Direct at 60.

held prior to this case being filed was driven by the terms of the Settlement Agreement in its 2023 base rate case (which ultimately was not approved by the Commission), in which the Company agreed to file for new DSM programs by May 1, 2024. The Company did the best it could with the timeline agreed to in that proceeding.

The Company is not opposed to future collaboration prior to filing its next DSM Plan, but there does not need to be a formal process set by the Commission for that collaboration to occur. Additionally, to the extent the Joint intervenors wish to further collaborate with the Company, that collaboration should be focused on how to make the proposed programs as successful as possible so the Company will have a basis to expand its offerings in the future.

## IV. CONCLUSION

**Q. IS THE COMPANY'S DSM PLAN REASONABLE AND CONSISTENT WITH THE STATUTORY REQUIREMENTS ABSENT THE RECOMMENDATIONS MADE BY THE JOINT INTERVENORS?**

A. Yes. The Company demonstrated in its direct case that the proposed programs are cost-effective, as supported by its MPS, while balancing the bill impacts to customers. Additionally, the Company demonstrated that its proposal supports specific changes in customers' consumption patterns, is supported by the cost and benefit analysis, is consistent with the Company's most recent IRP, does not result in any unreasonable prejudice or disadvantage to any class of customer, that customer representatives were involved in developing the plan, and that the plan includes programs that are available, affordable and useful to customers. Therefore, the Commission should approve the Company's proposal without modification.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does.

## VERIFICATION

The undersigned, Tanner S. Wolffram, being duly sworn, deposes and says he is the Directory of Regulatory for Kentucky Power Company, that he has personal knowledge of the matters set forth in the foregoing testimony and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.

Tanner S. Wolffram

Tanner S. Wolffram

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| Commonwealth of Kentucky | ) | |
| | ) | Case No. 2024-00115 |
| County of Boyd | ) | |

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Tanner S. Wolffram, on September 16, 2024.

Marilyn Michelle Caldwell

Notary Public

MARILYN MICHELLE CALDWELL
Notary Public
Commonwealth of Kentucky
Commission Number KYNP71841
My Commission Expires May 5, 2027

My Commission Expires May 5, 2027

Notary ID Number KYNP71841