

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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)	Case No. 2024-00115
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)	

**Kentucky Power Company’s Request To Submit Matter For
Decision On The Written Record**

Kentucky Power Company moves the Public Service Commission of Kentucky in accordance with the Commission’s August 1, 2024 Order to submit this matter for a decision on the written record. The Company believes that a hearing is not necessary in this case. The Company’s proposals are well-supported and will benefit customers. The Joint Intervenors’ witnesses do not oppose the Company’s proposed programs, but rather encourage the Commission to expand or modify the proposed programs. These recommendations, while made in good faith, are not supported by sufficient evidence, unlike the Company’s proposals, and should be rejected at this time. The Company was intentional about the programs it selected to propose in this case. The Company was conscious of the need to gradually phase-in additional demand-side management programs in order to mitigate customer rate impacts. The Company has committed to continuing to evaluate potential additional DSM options in the future, will take the Joint Intervenors’ recommendations into account, and will continue collaborating with the Joint Intervenors, as that evaluation continues.

In sum, the Company's proposals are well-supported and meet the statutory requirements of KRS 278.285. The proposed programs should be approved so that the benefits may be made available to customers as quickly as possible prior to the 2024/2025 winter heating season when the DSM programs would be most beneficial.

However, the Company will defer to the Commission if the Commission or Commission Staff determine that a hearing is needed or would be beneficial to supplement the record of this matter with additional evidence so that the Company's application may be granted. In that event, the Company would be amenable to making its witnesses available for any such hearing at the convenience of the Commission. The Company also is willing to attend an informal conference with Commission Staff and the parties to discuss any outstanding issues, any evidence submitted, or to discuss any other matters that would aid in the handling and disposition of the case.

WHEREFORE, Kentucky Power respectfully requests that the Commission submit this matter for a decision on the written record and issue its final order approving the Company's application **on or before December 1, 2024**, so that the proposed DSM programs may be made available to customers prior to the winter heating season.

Respectfully submitted,



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