

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

<b>ELECTRONIC TARIFF FILING OF</b>	)	
<b>KENTUCKY POWER COMPANY TO</b>	)	<b>Case No. 2024-00305</b>
<b>REVISE ITS INDUSTRIAL GENERAL</b>	)	
<b>SERVICE TARIFF</b>	)	

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**BRIEF OF THE ATTORNEY GENERAL**

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In accordance with the Commission’s Order of December 20, 2024, the Attorney General provides the following.

The tariff filing made by Kentucky Power Company requires, among other things, that new large-load customers (150 MW or greater) (1) enter long-term, 20-year contracts, (2) make certain payments if they do not meet their obligations under those contracts, (3) maintain minimum billing demand, (4) provide collateral for certain charges, and meet other requirements. These requirements appear to be calculated at insulating existing ratepayers from bearing the weight of transmission and distribution investments driven solely by these new loads. Protecting existing ratepayers from such rate increases is not only appropriate, but necessary. The Commission should only approve the tariff if it is satisfied that the proposed requirements are sufficient to protect existing customers from these charges.

Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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*Certificate of Service and Filing*

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on January 17, 2025 an electronic copy of the foregoing was served via the Commission's electronic filing system.

this 17th day of January, 2025.

A handwritten signature in blue ink, appearing to read "J. Michael New". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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Assistant Attorney General