

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024

DATA REQUEST

KPSC 2_1 Refer to Kentucky Power's response to Staff's First Request for Information (Staff's First Request), Item 5.

- a. Explain whether the response means that if Kentucky Power receives and places into service a refurbished meter that is ten years into its 15-year life span, the meter will be retired in five years.
- b. Explain at what point a meter reaching the end of its useful life will not be refurbished due to the cost of refurbishment.

RESPONSE

a. The useful life of equipment is based on the design life provided by the manufacturer and provides the Company with information that is useful for planning purposes. The Company does not proactively replace metering equipment simply because the equipment reaches the end of its useful life. Instead, the Company replaces equipment in the field when it fails. If a refurbished meter that is ten years into its 15-year useful life is placed into service, it will remain in service until it fails.

b. If a meter fails, it will be replaced. If that failed meter is capable of refurbishment, the Company will seek to have the meter refurbished. If the failed meter is refurbished, the refurbished meter may be used to replace a separate failed meter in the system. The age of the failed meter does not drive the determination of whether it will be refurbished. Instead, the nature of the failure and the availability of parts to complete the refurbishment work does. The useful life of the equipment is based on the design life provided by the manufacturer and provides the Company with a planning tool. However, the Company will replace the equipment when it fails, during or beyond its useful life.

Witness: Stephen D. Blankenship

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024
Page 1 of 2

DATA REQUEST

- KPSC 2_2** Refer to Kentucky Power's response to Staff's First Request, Item 7(c).
- a. Explain how many net metering customers Kentucky Power currently has in its service territory.
 - b. Confirm whether any of Kentucky Power's net metering customers will need new AMI meters installed, a second meter, or both if the Commission were to approve Kentucky Power's application. If confirmed, identify the number of net metering customers effected and describe Kentucky Power's method of identifying those customers.
 - c. Explain whether Kentucky Power or its impacted net metering customer would be responsible for the costs of purchasing and installing the second meter.
 - d. Explain whether Kentucky Power anticipates large growth in Electric Vehicle ownership, in calendar years 2025-2030, in its service territory. If so, provide any anticipated load growth data that would justify the load increase.
 - e. Explain what Kentucky Power means by "revenue grade load disaggregation".

RESPONSE

- a. As of December 27, 2024, Kentucky Power has 340 net metering customers in its service territory.
- b. A net metering customer will require a single AMI meter only. Of the 340 net metering customers, each will require only one new AMI meter.
- c. Not applicable, no second meter is required for net metering.
- d. Kentucky Power does not anticipate large or appreciable growth in electric vehicle ownership. In its most aggressive forecast, the Company only anticipates around 1,600 units to be owned by Kentucky Power customers by the year 2030. Because of the nominal amount of electric vehicle growth, the Company has not prepared any load growth data or projections.

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024
Page 2 of 2

e. Meter load disaggregation is the ability to distinguish between different load types being pulled through the meter. Currently, a second meter is required to provide usage between different loads such as EV charging. The metering equipment chosen however does include a second processor. This processor, when combined with a vendor or third-party application, that is not yet available, may allow for the ability to disaggregate the meter's load. This means, that in the future, Kentucky Power may be able to bill one meter for separate bills/tariffs.

Witness: Stephen D. Blankenship

Kentucky Power Company
Kpsc Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024

DATA REQUEST

Kpsc 2_3 Provide the number of customers, for each customer class, with online accounts. Include in the response whether the accounts are email, phone, or another category of online account by both number and percentage of online account customers in relation to the total amount of customers.

RESPONSE

Approximately 106,600, or 62 percent, of the Company's customers have registered for online accounts. Additionally, more than 104,000 customers have downloaded the Kentucky Power app. To register an account online, a customer must provide an email address; however, the Company may have an email address associated with an account that is used for communication purposes only and therefore not linked to an online account. A customer also may link a cell phone number to their account during the online registration, however an account may have a cell phone number associated with an account only and not a registered online account.

Customer Class	Registered Online	% Registered Online	Email Address	% with Email	Cell Phone Number	% with Cell Phone
Residential	89,500	64.73%	100,920	72.99%	93,220	67.42%
Commercial	14,680	52.53%	17,740	63.48%	14,070	50.37%
Industrial	514	51.30%	636	63.47%	441	44.01%
Public Authority	1,900	40.73%	2,410	51.56%	1,260	27.01%

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024

DATA REQUEST

KPSC 2_4 Refer to the informal conference held on December 17, 2024. Provide the threshold percentage Kentucky Power will use for a customer to receive higher than normal bill notification.

RESPONSE

A high bill alert is sent to a customer if their usage is expected to be 30 percent higher than the same month from the prior year.

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024
Page 1 of 3

DATA REQUEST

- KPSC 2_5** Refer to the Direct Testimony of Lerah Kahn (Kahn Direct Testimony), pages 21-22.
- a. Provide a breakdown of the cost savings for each deviation requested. If Kentucky Power cannot provide a monetary value, provide any information related to savings.
 - b. Provide a specific timeline for each deviation requested, including but not limited to a timeline related to meters replaced and older meters still in service. Include in the timeline when testing would cease, when testing would begin as well as a description of the location related to the specified time.
 - c. As to administrative regulation 807 KAR 5:041, reconcile the proposed deployment plan and the current meter testing schedule. In the response, explain how the deployment plan will address meters that will not be tested within the 8 year period as a result of the cessation of testing.
 - d. Confirm that Kentucky Power's deviation request is for the full four-year AMI deployment period. If not confirmed, explain.
 - e. Confirm that Kentucky Power is requesting a permanent deviation from testing meters every two years once AMI deployment is complete. If not confirmed, explain.
 - f. Describe who will inspect and ensure meter replacements meet the appropriate standards.

RESPONSE

a.

807 KAR 5:006 Sections 14(3)

The deviation requested would result in the elimination of two field trips (one to disconnect and one to reconnect). However, the cost savings associated with this deviation have been included within the Company's cost-benefit analysis.

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024
Page 2 of 3

807 KAR 5:006 Section 26(4)(e) and 26(5)(a)(2)

The Company currently inspects its meters every two years alongside its broader circuit inspection which the Company is not requesting a deviation from.

The meter inspection is approximately five to ten minutes but can be longer if an issue is found. Accordingly, the cost savings associated with the requested deviation from this requirement would equal approximately the average meter inspection time spent *times* personnel cost *times* number of meters tested (which on an annual basis would be approximately 80,000 or half the Company's total meter base of approximately 160,000).

807 KAR 5:041, Sections 15(3) and 16

This deviation request seeks to avoid testing of AMR meters that will be retired as a result of AMI deployment over the four-year deployment period. Once the meters have been replaced the Company will resume testing. Therefore, it would not be an ongoing cost-savings.

The testing of a single meter takes approximately 20-25 minutes. Accordingly, the cost-savings would be this 20-25 minutes *times* the personnel cost *times* the number of AMR meters retired for each given year of deployment.

b.

807 KAR 5:006 Section 14(3)

Company employees are trained on tampering and theft. They will be trained, at the time of installation, to identify and address meter tampering activities. Once AMI meters are installed, the AMI meters provide the Company with immediate insight into fraudulent use that would prevent the need for an inspection of the meter and service connection. The Company plans to continue following the rule in regions where AMR is still active. If granted, the deviation would be indefinite in regions where AMI is installed.

807 KAR 5:006 Section 26(4)(e) and 26(5)(a)(2)

AMI meters allow Kentucky Power to receive automated metering insights. AMI meters self-diagnose and are able to see if the device has an issue. If an issue is discovered, the meter will prompt the meter department and dispatch if it has a problem. This deviation would be permanent once deployment is complete.

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024
Page 3 of 3

807 KAR 5:041, Sections 15(3) and 16

The Company is requesting a deviation based upon the schedule of deployment. It is not necessary to test a meter that will be replaced by the AMI deployment. Once the deployment is complete in that region, Kentucky Power will continue to adhere to these rules.

c. AMR meters will continue to be included within the Company's requirement to meet 807 KAR 5:041 unless they have been retired. For AMI meters, see the Company's response regarding 807 KAR 5:041 Sections 15(3) and 16 in subpart b.

d. and e. The Company is unsure which deviation request is being referenced in this subpart. Nonetheless, please see the Company's response in subpart b for deviation timelines for each deviation requested.

f. Meter replacements will be inspected by Company personnel and Company-trained contractors.

Witness: Stephen D. Blankenship

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024

DATA REQUEST

KPSC 2_6 Refer to Case No. 2024-00017, as discussed at the informal conference held on December 17, 2024. Provide the remaining amount of approved indebtedness not yet utilized by Kentucky Power.

RESPONSE

As of December 31, 2024, the Company had \$150 million remaining on its approved long-term debt authority. On January 2, 2025, the Company issued a \$150 million term loan to repay some of its elevated short-term debt balance used to fund the Company's operations until its pending securitization bonds are issued. The Company anticipates filing for additional long-term debt authority in the near future.

Witness: Lerah M. Kahn

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's Second Set of Data Requests
Dated December 30, 2024

DATA REQUEST

KPSC 2_7 Refer to the informal conference held on December 17, 2024. Explain if a customer can request a physical copy of the AMI data through the customer service hotline if the customer is unable to access the data through the online portal.

RESPONSE

Yes, a customer will have the ability, as they currently do, to contact the Company and request that a physical copy of their usage history be sent to them if they do not have access to their online portal.

Witness: Stevi N. Cobern

Certificate Of Completion

Envelope Id: 87C609CA-F375-45EB-BAB4-FE2339683183
 Subject: Complete with Docusign: Blankenship Verification Form.doc
 Source Envelope:
 Document Pages: 1 Signatures: 2
 Certificate Pages: 5 Initials: 0
 AutoNav: Enabled
 Envelopeld Stamping: Disabled
 Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Status: Completed
 Envelope Originator:
 Michelle Caldwell
 mmcaldwell@aep.com
 IP Address: 167.239.221.105


Record Tracking

Status: Original Holder: Michelle Caldwell Location: DocuSign
 1/8/2025 7:12:17 PM mmcaldwell@aep.com

Signer Events

Stephen D. Blankenship
 sdblank1@aep.com
 Security Level: Notarized Signing (Notary: Michelle Caldwell)

Signature

Signed by:

 740DD2C67917497...
 Signature Adoption: Pre-selected Style
 Using IP Address: 167.239.221.103

Timestamp

Sent: 1/8/2025 7:14:01 PM
 Resent: 1/8/2025 7:43:21 PM
 Viewed: 1/8/2025 7:50:18 PM
 Signed: 1/8/2025 7:50:57 PM

Electronic Record and Signature Disclosure:
 Accepted: 1/8/2025 7:50:18 PM
 ID: e8dd3623-407a-40e1-9118-39a86f9c36ce

In Person Signer Events

Signature

Timestamp

Editor Delivery Events

Status

Timestamp

Agent Delivery Events

Status

Timestamp

Intermediary Delivery Events

Status

Timestamp

Certified Delivery Events

Status

Timestamp

Carbon Copy Events

Status

Timestamp

Witness Events

Signature

Timestamp

Notary Events

Signature

Timestamp

Michelle Caldwell
 mmcaldwell@aep.com
 Regulatory Case Coordinator
 AEP Kentucky Power

MARILYN MICHELLE CALDWELL
 ONLINE NOTARY PUBLIC
 COMMONWEALTH OF KENTUCKY
 Commission #KYNP71841
 My Commission Expires 5/5/2027

Sent: 1/8/2025 7:14:01 PM
 Viewed: 1/8/2025 7:50:11 PM
 Signed: 1/8/2025 7:51:13 PM

Notary for Stephen D. Blankenship
 (sdblank1@aep.com)

Using IP Address: 167.239.221.105

Security Level: Email, Account Authentication (Required), Digital Certificate

Signature Provider Location:
<https://ssasign.docusign.net/sca/1940>

Signature Provider Details:

Signature Type: DS Authority IDV (Client ID: c171dfd7-d7e5-4793-b1bf-4d660787eaa0)

Signature Issuer: DocuSign Cloud Signing CA-Identity

Electronic Record and Signature Disclosure:
 Not Offered via DocuSign

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	1/8/2025 7:14:01 PM
Envelope Updated	Security Checked	1/8/2025 7:43:21 PM
Certified Delivered	Security Checked	1/8/2025 7:50:18 PM
Signing Complete	Security Checked	1/8/2025 7:50:57 PM
Completed	Security Checked	1/8/2025 7:51:13 PM

Payment Events	Status	Timestamps
-----------------------	---------------	-------------------

Electronic Record and Signature Disclosure
