COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application Of Kentucky Power Company For (1) A Certificate Of Public Convenience And Necessity Authorizing The Deployment Of Advanced Metering Infrastructure; (2) Request For Accounting Treatment; And (3) All Other Necessary Waivers, Approvals, And Relief	))))))	Case No. 2024-00344

APPLICATION

Kentucky Power Company ("Kentucky Power" or the "Company") applies to the Public Service Commission of Kentucky ("Commission") pursuant to KRS 278.020(1) and 807 KAR 5:001, Section 14, and 807 KAR 5:001, Section 15 for a Certification of Public Necessity ("CPCN") to be issued on or before February 28, 2025, for the deployment of Advanced Metering Infrastructure ("AMI"); approval of accounting treatment to establish a regulatory asset to accumulate and defer for later review and recovery the costs for AMI deployment; and a waiver of the testing requirements in 807 KAR 5:006, Section 14(3); 807 KAR 5:006, Sections 26(4)(e) and 26(5)(a)(2); and 807 KAR 5:041, Sections 15(3) and 16. In support of its Application, Kentucky Power states:

APPLICANT

1. **Name and Address**: The Applicant's full name and post office address is: Kentucky Power Company, 1645 Winchester Avenue, Ashland, Kentucky 41101. The Company's electronic mail address is kentucky_regulatory_services@aep.com.

2. **Incorporation**: Kentucky Power is a corporation organized on July 21, 1919 under the laws of the Commonwealth of Kentucky. The Company currently is in good standing in Kentucky.[1]

3. **Business**: Kentucky Power is a public utility principally engaged in the provision of electricity to Kentucky consumers. The Company generates and purchases electricity that it distributes and sells at retail to approximately 163,000 customers located in all, or portions of, the Counties of Boyd, Breathitt, Carter, Clay, Elliott, Floyd, Greenup, Johnson, Knott, Lawrence, Leslie, Letcher, Lewis, Magoffin, Martin, Morgan, Owsley, Perry, Pike, and Rowan. The Company also furnishes electric service at wholesale to the City of Olive Hill and the City of Vanceburg.

BACKGROUND

4. Pursuant to KRS 278.020(1) and 807 KAR 5:001, Section 15(2), the Company requests a Certificate of Public Convenience and Necessity ("CPCN") to replace its existing Automated Meter Reading ("AMR") meters with Advanced Metering Infrastructure ("AMI") meters over the four-year period, 2026–2029. Kentucky Power also seeks approval of accounting treatment to establish a regulatory asset to accumulate and defer for later review and recovery the costs for AMI deployment and a waiver of the testing requirements in 807 KAR 5:006, Section 14(3); 807 KAR 5:006, Sections 26(4)(e) and 26(5)(a)(2); and 807 KAR 5:041, Sections 15(3) and 16.

5. The Company currently has approximately 166,709 AMR meters in its service territory, which were installed in 2005–2006. The Company's AMR meters have a 15-year design

[1] A certified copy of the Company's Articles of Incorporation and all amendments thereto was attached to the Joint Application in *In the Matter Of: The Joint Application Of Kentucky Power Company, American Electric Power Company, Inc. And Central And South West Corporation Regarding A Proposed Merger*, P.S.C. Case No. 99-149. The Company's November 7, 2024 Certificate of Existence is attached as **Exhibit 2** to this Application.

life expectancy. As the Company's AMR meters approach or exceed the end of their design life and the instances of AMR meter failures increase, the Company must address the technology employed by its AMR meters, as well as the failure and obsolescence of the meters themselves.

6. The Company's existing AMR meters are no longer manufactured and the Company is reliant on a single vendor to refurbish AMR meters to support its existing metering infrastructure. Relying on this single manufacturer to continue to support the Company's existing AMR infrastructure is neither reasonable nor prudent. Moreover, the platform that the meters are operated on is no longer supported by any vendor. Therefore, as discussed further herein and in the testimonies of Company Witnesses Kahn, Blankenship, and Cobern, the planned replacement of the Company's existing AMR meters with AMI meters, which have become the industry metering standard, is the most reasonable and prudent course of action to address the obsolescence and increasing physical failure of the Company's AMR meters.

LEGAL STANDARD

7. Under KRS 278.020(1), no utility may construct or acquire any facility to be used in providing utility service to the public until it has obtained a CPCN from the Commission. To obtain a CPCN, the utility must demonstrate a need for such facilities and an absence of wasteful duplication.

8. "Need" requires:

> [A] showing of a substantial inadequacy of existing service, involving a consumer market sufficiently large to make it economically feasible for the new system or facility to be constructed or operated.
>
> [T]he inadequacy must be due either to a substantial deficiency of service facilities, beyond what could be supplied by normal improvements in the ordinary course of business; or to indifference, poor management, or

> disregard of the rights of consumers, persisting over such a period of time as to establish an inability or unwillingness to render adequate service.[2]

9. "Wasteful duplication" is defined as "an excess of capacity over need" and "an excess investment in relation to productivity or efficiency, and an unnecessary multiplicity of physical properties."[3] To demonstrate that a proposed facility does not result in wasteful duplication, the Commission has held that the applicant must demonstrate that a thorough review of all reasonable alternatives has been performed.[4] Selection of a proposal that ultimately costs more than an alternative does not necessarily result in wasteful duplication.[5] All relevant factors must be balanced.[6]

STATEMENT OF PUBLIC CONVENIENCE AND NECESSITY

(a) Need

10. The Company needs to replace its existing metering infrastructure for two reasons. First, replacing the existing AMR meters with AMI provides benefits to customers and reduces the cost to serve customers. Second, there is a need to replace Kentucky Power's existing AMR metering system because the technology required to operate it is obsolete, threatening the Company's ability to provide adequate service to its customers. Kentucky Power increasingly is required to replace and repair its existing AMR meters as they approach and exceed their design life and fail at a growing rate. There are no longer any vendors manufacturing the Company's

[2] *Ky. Utils. Co. v. Pub. Serv. Comm'n*, 252 S.W.2d 885, 890 (Ky. 1952).

[3] *Id.*

[4] Order at 11, Case No. 2005-00142, *Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for the Construction of Transmission Facilities in Jefferson, Bullitt, Meade, and Hardin Counties, Kentucky* (Ky. P.S.C. Sept. 8, 2005).

[5] *See Ky. Utils. Co. v. Pub. Serv. Comm'n*, 390 S.W.2d 168, 175 (Ky. 1965); *see also* Case No. 2005-00089, *The Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity to Construct a 138 kV Electric Transmission Line in Rowan County, Kentucky* (Ky. P.S.C. Aug. 19, 2005).

[6] Case No. 2005-00089, Order at 6.

current AMR meters. Only one vendor in the United States is refurbishing the type of AMR meters used by the Company, and that vendor is shifting its focus to AMI meters.

11. Moreover, the meters are currently operated on a Standard Consumption Messaging ("SCM") platform, which is no longer supported by any vendor and is not compatible with other SCM+ platforms. In an effort to maintain its existing AMR system, the Company has been purchasing refurbished meters to maintain the currently deployed platform. The Company cannot, however, simply continue to replace the existing AMR meters with refurbished AMR meters. Additionally, the Company cannot simply buy new AMR meters because the new AMR meters only run on the SCM+ platform. Therefore, continued use of AMR meters would require replacing the SCM technology with SCM+, and would lead to necessary enhancements to Kentucky Power's systems due to the differences between the platforms. In addition to the Request for Proposal discussed below, Kentucky Power solicited a Request for Quote ("RFQ") for the installation of SCM+ meters and infrastructure, that included a request for a guarantee that the platform would be supported for at least twenty years. The vendor that responded to the RFQ made no such guarantee. As demonstrated by the Direct Testimony of Company Witnesses Kahn and Blankenship, continuing with new AMR meters, and migrating to a SCM+ platform is the most expensive alternative that Kentucky Power considered. Doing this would also deprive customers of the benefits associated with AMI meters discussed below. As such, the existing metering infrastructure is obsolete and incapable of providing adequate service to Kentucky Power customers.

12. Given the obsolescence of the Company's existing AMR meters and the significant benefits associated with the Company's proposed AMI deployment, the planned replacement of the Company's existing AMR meters with AMI technology over a four-year period is the most

reasonable and prudent course of action to continue to provide safe and reliable service to customers in the Company's service territory.

13. Although the Company's current practice of refurbishing AMR meters that are past their useful life has sustained its needs thus far, it is not an efficient or cost-effective process, because getting the refurbished meters in use requires resetting and reprogramming them, which still cannot guarantee a 15-year lifetime.

14. AMI allows for two-way communication between AMI meters and the utility company, allowing for streamlined information sharing regarding usage and other data for billing and analysis, as well as remote connection and disconnection. As described in the testimony of Company Witness Blankenship, AMI technology will work in the Company's service territory, and the two-way communication would provide significant benefits to customers and the Company, as both would have access to more accurate and real-time information, which is simply not possible with AMR meters.

15. The Company's proposed AMI deployment will provide significant benefits to its customers. AMI meters provide comprehensive usage data that allows customers to better monitor and regulate their electric usage. AMI meters also eliminate estimated bills, provide the Company with the data needed to address outages in promptly and with more precision, allow the Company to perform service connection and reconnection more quickly to better suit customer needs, and, as currently proposed, eliminate reconnection fees. AMI meters are also needed to accommodate customers' efforts to install distributed energy resources ("DER").

16. Furthermore, the Company's proposed AMI deployment will provide significant reliability and operational benefits. Specifically, AMI technology can identify outages more quickly and accurately, identify distribution line transformers that are approaching failure allowing

the Company to replace them proactively, and monitor the health of the meters. AMI meters can also support equipment automation, energy efficiency programs, phasing identification, and gathering load information for devices and network systems in order to design future load increases. Moreover, remote connection and disconnection would improve the safety of Kentucky Power employees, who would less frequently have to enter customer property and face unpredictable and sometimes dangerous obstacles.

17. The Commission has previously recognized the need for the deployment of AMI metering systems that provide the aforementioned benefits to customers where a utility is prevented from providing adequate service to its customers because it's existing metering system has grown to be obsolete.[7]

(b) Wasteful Duplication

18. Kentucky Power's proposal to retire its current AMR metering system and deploy an AMI system in its place will not result in "an excess capacity over need" and thus will not be wastefully duplicative because it is not "an excessive investment in relation to productivity or efficiency, . . . [nor] an unnecessary multiplicity of physical properties." The Company's existing system is becoming obsolete and, if not addressed, would render the Company unable to provide adequate service. As such, deploying a new system will not be in excess of what is needed to render service suitable for its customers.

[7] *See, e.g.*, Order, Case No. 2017-00419, *Application of Grayson Rural Electric Cooperative Corporation of Grayson, Kentucky, for Commission Approval Pursuant to 807 KAR 5:001 And KRS 278.020 for Certificate of Public Convenience and Necessity to Install an Advanced Metering Infrastructure (AMI) System* (Ky. P.S.C. July 16, 2018); Order, Case No. 2018-00056, *Application of Cumberland Valley Electric, Inc. for Commission Approval for a Certificate of Public Convenience and Necessity to Install an Advanced Metering Infrastructure (AMI) System Pursuant to KRS 807 KAR 5:001 and KRS 278.020* (Ky. P.S.C. July 9, 2018); Order, Case No. 2016-00077, *Application of Licking Valley Rural Electric Cooperative Corporation for an Order Issuing a Certificate of Public Convenience and Necessity* (Ky. P.S.C. Aug. 29, 2016).

19. In an effort to determine the least cost, reasonable alternative that allows it to offer adequate service going forward, the Company issued a Request for Proposals for replacing the Company's obsolete AMR metering infrastructure with AMI systems on February 14, 2024. The Company also issued an RFQ for replacing the Company's obsolete meters with AMR meters utilizing the SCM+ platform.

20. Following its review of the responses to the RFP, Kentucky Power selected the AMI system proposed by Landis+Gyr. The Company next performed a cost-benefit analysis comparing the following options: (1) a proactive replacement (occurring during the 2026-2029 time period) of the Company's existing AMR metering infrastructure with the selected AMI system; (2) a reactive replacement (where existing meters are replaced when they fail) of the Company's existing AMR metering infrastructure with the selected AMI system; (3) a proactive replacement of the Company's existing AMR metering infrastructure with AMR meters utilizing the SCM+ platform; and (4) a reactive replacement of the Company's existing AMR metering infrastructure with AMR meters utilizing the SCM+ platform.

21. The cost-benefit analysis was based on a 20-year forecast and considered the Net Present Value and the Total Resource Cost and separated those costs between capital and O&M expenses. The results of the cost benefit can be found at Exhibit LMK-1 of Company Witness Kahn's testimony. Based on this analysis, the Company determined that proactively replacing its current metering system with the AMI supplied by Landis+Gyr was the most reasonable, least-cost alternative to provide service to its customers.

PERMITS OR FRANCHISES

22. No permits or franchises are required for the proposed AMI meter deployment. 807 KAR 5:001, Section 15(2)(b).

DESCRIPTION OF PROPOSED LOCATION FOR CONSTRUCTION

23. The proposed AMI deployment will occur throughout the Company's entire service territory. As the Company's proposal is only applicable to the Company's service territory, the proposed AMI deployment will not compete with any other public utilities, corporations, or persons. 807 KAR 5:001, Section 15(2)(c).

AREA MAP

24. The proposed AMI deployment will occur throughout the Company's entire service area. A map of the Company's service territory throughout which AMI meters will be deployed is included as Exhibit SDB-1 to the testimony of Company Witness Blankenship. The Company believes the map satisfies 807 KAR 5:001, Section 15(2)(d)(1), but if the Commission finds that it does not, the Company requests a deviation from the same.

PLANS AND SPECIFICATIONS

25. Exhibits SDB-2 through SDB-5 contain specifications for the communication networks, network gateways, meters, and routers to be installed. The Company believes this information satisfies 807 KAR 5:001, Section 15(2)(d), but if the Commission finds it does not, the Company requests a deviation from the same.

FINANCING AND ESTIMATED COST

26. The deployment of AMI does not involve sufficient capital outlay to materially affect Kentucky Power's financial condition. The Company proposes to fund the cost of its proposed AMI deployment, including any incremental O&M expenses, through the Company's operating cash flow and other internally generated funds. 807 KAR 5:001, Section 15(2)(e)

27. The total estimated cost of the initial construction for the AMI deployment is approximately $41.1 million. The estimated annual ongoing costs of operation once deployment

is complete is expected to range from approximately $600,000-900,000 per year over the remaining 16-years after deployment analyzed in the CBA. 807 KAR 5:001, Section 15(2)(f).

APPLICATION FOR APPROVAL OF ACCOUNTING TREATMENT TO ESTABLISH A REGULATORY ASSET

28. The Company incorporates paragraphs 1 through 27 of this Application as if fully reinstated herein.

29. The Company proposes to accumulate and defer the costs of the AMI deployment until the costs can be included in its rate base in a subsequent base rate case. To that end, the Company requests Commission approval to establish a regulatory asset and a deferral, including a return on the unamortized balance at the Company's approved weighted average cost of capital.

30. This regulatory asset would correspond to the implementation period for AMI and be comprised of costs associated with the AMI project implementation, including depreciation expense and a pre-tax WACC return on AMI rate base, incremental property tax expense and incremental O&M expense. Consistent with the FERC Uniform System of Accounts, the Company plans to recover the remaining net book value of electric meters replaced and retired to Account 108 as part of this project through future depreciation rates.

31. Financial Accounting Standards Board Accounting Standards Codification ("FASB Codification" or "ASC") 980-340-25-1 requires utility management to defer and capitalize a current cost (as a regulatory asset) when in management's judgment the cost is probable of recovery. ASC 980-405-25-1 requires deferral accounting based on the existence of a regulatory liability when a true-up to actual costs results in an over-recovery and probable refund to customers in a future ratemaking proceeding. The FASB ASC Master Glossary defines "probable" as "the future event or events are likely to occur." Evidence of probable recovery includes orders from the

regulator specifically authorizing deferral of the current cost or current obligation for later review and recovery or refund through rates.

32. The requested order granting Kentucky Power authority to accumulate and defer for later review and recovery the costs for AMI deployment described above in a regulatory asset would permit Kentucky Power to establish the regulatory asset.

33. The authority for establishing regulatory assets arises under the Commission's plenary authority to regulate utilities under KRS 278.040 and the Commission's authority to establish a system of accounts under KRS 278.220.[8] Traditionally, the Commission has exercised its discretion to approve a regulatory asset upon demonstration that the expenses to be deferred fall into one of four categories:

> (1) an extraordinary, nonrecurring expense which could not have reasonably been anticipated or included in the utility's planning; (2) an expense resulting from a statutory or administrative directive; (3) an expense in relation to an industry sponsored initiative; or (4) an extraordinary nonrecurring expense that over time will result in a saving that fully offsets the cost.[9]

34. The costs for AMI deployment are eligible for inclusion in a regulatory asset. First, the Company will incur these costs to meet the Company's statutory obligations to provide adequate, efficient, and reasonable service. Accordingly, the costs for AMI deployment should be considered an expense resulting from a statutory or administrative directive. Additionally, the costs for AMI deployment are eligible for inclusion because they are extraordinary and non-recurring. These costs are not ongoing in nature and are not otherwise captured by the ratemaking process or included in the Company's base rates.

[8] *In The Matter Of: The Application of East Kentucky Power Cooperative, Inc. For An Order Approving Accounting Practices To Establish A Regulatory Asset Related To Certain Replacement Power Costs Resulting From Generation Forced Outages*, Case No. 2008-00436 at 3-4 (Ky. P.S.C. December 23, 2008).

[9] *Id*.

35. In accordance with FASB ASC 980-340-25-1 and Commission precedent, Kentucky Power requests that the Commission exercise its authority under KRS 278.220 to prescribe the manner in which the Company keeps its accounts by entering an order permitting Kentucky Power to accumulate and defer for review and recovery in in a subsequent base rate case the costs for AMI deployment. If the requested relief is granted, Kentucky Power will record the regulatory asset in FERC Account No. 182.3.

WAIVERS/DEVIATIONS

36. The Company incorporates paragraphs 1 through 35 of this Application as if fully reinstated herein.

37. The Company is requesting a waiver of 807 KAR 5:006, Section 14(3); 807 KAR 5:006, Sections 26(4)(e) and 26(5)(a)(2); and 807 KAR 5:041, Sections 15(3) and 16 during the time period that AMI meters are deployed.

38. 807 KAR 5:006, Section 14(3) requires inspection of meter and service connections before providing new service to ensure no prior or fraudulent use is attributed to the new customer. AMI metering will provide the Company with information and alarms (including for tampering) that would prevent this scenario from occurring.

39. 807 KAR 5:006, Sections 26(4)(e) and 26(5)(a)(2) require the inspection of meters every two years. AMI metering will provide insight into the condition of every meter daily. Accordingly, the proposed deviation will ensure that the intent of these regulations is met while allowing further cost-savings (beyond what is captured in the Company's CBA).

40. 807 KAR 5:041, Sections 15(3) and 16 require that a single-phase electric meter must be tested every 8 years or in accordance with a Commission approved sample-meter testimony plan. Because the Company proposes to replace all of its existing non-AMI single-

phase meters within four years, continued testing during the period would be unnecessary. The Company will resume testing its meters once the AMI deployment is complete. Section 15(3) also requires the Company to test its metering equipment when it is removed from service. Because the Company proposes to dispose of the existing infrastructure as they are removed, there would be little-to-no benefits to continue to test the removed meters.

TESTIMONY

41. The testimonies of Lerah M. Kahn, Stevi N. Cobern, and Stephen D. Blankenship are filed in support of this Application.

EXHIBITS

42. The exhibits listed in the Appendix to this Application are attached to and made a part of this Application.

COMMUNICATIONS

43. Kentucky Power respectfully requests that communications in this matter be addressed to the e-mail addresses identified on Kentucky Power's October 22, 2024, Notice of Election and Use of Electronic Filing Procedures.

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

1. Granting Kentucky Power a CPCN to deploy and implement Advanced Metering Infrastructure as described in this application and Company testimony;

2. Authorizing Kentucky Power Company in accordance with FASB ASC 980-340-25-1 and Commission precedent to accumulate and defer for review and recovery in a future base rate proceeding the costs for AMI deployment;

3. Granting a waiver of the meter testing requirements in 807 KAR 5:006, Section 14(3); 807 KAR 5:006, Sections 26(4)(e) and 26(5)(a)(2); and 807 KAR 5:041, Sections 15(3) and 16 during the time period that AMI meters are deployed; and

4. Granting Kentucky Power all additional relief to which it may be entitled.

Respectfully submitted,

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APPENDIX

Exhibit 1 Application Requirements Checklist

Exhibit 2 November 7, 2024, Certificate of Existence

Exhibit 3 General Description of Kentucky Power's Property

Exhibit 1

Application Requirements Checklist

Requirement	Description of Requirement	Location(s) in Filing
General Application Requirements		
807 KAR 5:001		
Section 7(1)	The application and 10 copies.	Company is e-filing.
Section 4(3)	Paper signed by submitting party or attorney.	Application at p. 14
Section 4(3)	Name, address, telephone number, fax number, and e-mail address of submitting party or attorney.	Application at p. 14
Section 4(10)	Personal information must be redacted.	Complied.
Section 8(2)(a)	At least seven (7) days prior to the submission of its application, an applicant shall file written notice of its election to use electronic filing procedures using the Notice of Election of Use of Electronic Filing Procedures form.	Complied.
Section 8(4)(b)	E-filed documents must be .pdf files that: • are searchable and optimized for internet viewing; • have bookmarks distinguishing sections; • if scanned material, be at resolution of 300 DPI	Complied.
Section 8(5)(a)	Each electronic submission shall include an introductory file in portable document format that is named "Read1st" and that contains a general description of the filing.	Read1st, filed November 8, 2024
Section 8(5)(a)	Each electronic submission shall include an introductory file in portable document format that is named "Read1st" and that contains a list of all material to be filed in paper or physical medium but not included in the electronic submission, and a statement that the material in the electronic submission are a true representation of the materials in paper medium.	Read1st, filed November 8, 2024

Section 8(5)(b)	The "Read1st" file and any other material that normally contains a signature shall contain a signature in the electronically submitted document.	Read1st, filed November 8, 2024
Section 14(1)	Full name, mailing address, and e-mail address of applicant.	Application at ¶ 1
Section 14(1)	Facts on which application is based, with request for the order, authorization, permission, or certificate desired.	Application, introductory paragraph, *passim*; Direct Testimony of Lerah M. Kahn; Direct Testimony of Stevi N. Cobern; Direct Testimony of Stephen D. Blankenship.
Section 14(1)	A reference to the particular law requiring Commission approval.	Application at introductory paragraph.
Section 14(2)	If a corporation, the applicant shall identify in the application the state in which it is incorporated and the date of its incorporation, attest that it is currently in good standing in the state in which it is incorporated, and if it is not a Kentucky corporation, state if it is authorized to transact business in Kentucky.	Application at ¶ 2; Application Exhibit 2.
Section 14(3)	If a limited liability company, the applicant shall identify in the application the state in which it is organized and the date on which it was organized, attest that it is in good standing in the state in which it is organized, and, if it is not a Kentucky limited liability company, state if it is authorized to transact business in Kentucky.	N/A
Section 14(4)	If the applicant is a limited partnership, a certified copy of its limited partnership agreement and all amendments, if any, shall be annexed to the application, or a written statement attesting that its partnership agreement and all amendments have been filed with the commission n a prior proceeding and referencing the case number of the prior proceeding.	N/A
Applications for Certificates of Public Necessity		
Section 15(2)(a)	The facts relied upon to show that the proposed construction or extension is or will be required by public convenience or necessity.	Application, introductory paragraph, *passim*; Direct

		Testimony of Lerah M. Kahn; Direct Testimony of Stevi N. Cobern; Direct Testimony of Stephen D. Blankenship.
Section 15(2)(b)	Copies of franchise or permits, if any, from the proper public authority for the proposed construction or extension, if not previously filed with the Commission.	Application at ¶ 22
Section 15(2)(c)	A full description of the proposed location, route, or routes of the proposed construction or extension, including a description of the manner of the construction and the names of all public utilities, corporations, or persons with whom the proposed construction or extension is likely to compete.	Application at ¶ 23
Section 15(2)(d)	One (1) copy in portable document format on electronic storage medium and two (2) copies in paper medium of maps to suitable scale showing the location or route of the proposed construction or extension as well as the location to scale of like facilities owned by others located anywhere within the map area with adequate identification as to the ownership of the other facilities; and plans a specifications and drawings of the proposed plant, equipment, and facilities.	Application at ¶¶ 24-25
Section 15(2)(e)	The manner in detail in which the applicant proposes to finance the proposed construction or extension.	Application at ¶ 26
Section 15(2)(f)	An estimated annual cost of operation after the proposed facilities are placed into service.	Application at ¶ 27

Exhibit 2

Commonwealth of Kentucky
Michael G. Adams, Secretary of State

Michael G. Adams
Secretary of State
P. O. Box 718
Frankfort, KY 40602-0718
(502) 564-3490
http://www.sos.ky.gov

Certificate of Existence

Authentication number: 322414
Visit https://web.sos.ky.gov/ftshow/certvalidate.aspx to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

KENTUCKY POWER COMPANY

KENTUCKY POWER COMPANY is a corporation duly incorporated and existing under KRS Chapter 14A and KRS Chapter 271B, whose date of incorporation is July 21, 1919 and whose period of duration is perpetual.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that Articles of Dissolution have not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 7th day of November, 2024, in the 233rd year of the Commonwealth.

Michael G. Adams
Secretary of State
Commonwealth of Kentucky
322414/0028317

Exhibit 3

General Description of Kentucky Power's Property

Applicant's property in Kentucky includes the 295 megawatt Big Sandy Plant generating station located in Lawrence County, constructed in conformity with certificates of public convenience and necessity issued by this Commission; transmission lines and all appurtenant facilities; distribution lines; transmission aid distribution stations and equipment; office buildings and equipment; storerooms for operation and maintenance materials; data processing equipment; metering equipment; communication equipment and motor vehicles. Applicant also owns an undivided 50% interest in the 1,560 MW Mitchell Plant generating station located in Moundsville, West Virginia, acquired and maintained in conformity with the certificates of public convenience and necessity issued by this Commission. The total original cost of Applicant's property is $3,680,776,616 as of September 30, 2024, which includes $862,985 of capital leases and $1,947,054 of operating leases. The total original cost also includes $62,476,566 of real property located in Kentucky, consisting of $20,197,211 of land and $42,279,355 of land rights.