

Kentucky Power Company
KPSC Case No. 2024-00344
Commission Staff's First Set of Data Requests
Dated December 10, 2024

DATA REQUEST

- KPSC 1_1** Refer to the Direct Testimony of Lerah M. Kahn (Kahn Direct Testimony), Figure LMK-1, page 6.
- a. Explain why IT Infrastructure – Billing and IT Infrastructure – Backhaul could not be undertaken once Kentucky Power receives the final Order authorizing the automated metering infrastructure (AMI) program or during the period when the meters are being ordered from the manufacturer.
 - b. Explain why Kentucky Power is waiting 9-12 months after receiving the final Order authorizing the AMI program to begin ordering the meters.

RESPONSE

- a. The Company would begin updating its IT Infrastructure to support AMI immediately upon receipt of a final Order authorizing the installation of the AMI system.
- b. The Company would begin ordering AMI meters soon after receiving a final Order in this case. Importantly, Figure LMK-1 is based on an Order being received by the July 2025 statutory deadline, not the Company's requested Order date. If an Order is received by February 28, 2024, all milestones in Figure LMK-1 would move forward.

Furthermore, the column to the right of the column labeled "Due Date" reflects the time to complete the task. For example, as it relates to ordering meters, the Company estimated it would take 9-12 months from the date the meters were ordered until they are received.

Witness: Lerah M. Kahn

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KPSC 1_2 Refer to Kahn Direct Testimony, page 9 lines 12 and 21. Provide Exhibits LMK-1 and LMK-2 in excel spreadsheets with all cells visible and unprotected.

RESPONSE

Please see the following for Exhibit LMK-1 in excel spreadsheet form along with the supporting workpapers:

KPCO_R_KPSC_1_2_ConfidentialAttachment1 (Proactive AMI),
KPCO_R_KPSC_1_2_ConfidentialAttachment2 (Reactive AMI),
KPCO_R_KPSC_1_2_ConfidentialAttachment3 (Proactive SCM+), and
KPCO_R_KPSC_1_2_ConfidentialAttachment4 (Reactive SCM+)

Please see KPCO_R_KPSC_1_2_Attachment5 for the source excel file for Exhibit LMK-2.

Witness: Lerah M. Kahn

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KPSC 1_3 Refer to Kahn Direct Testimony, page 10, lines 5-6. Explain the design life or useful life of the chosen AMI meters.

RESPONSE

The useful life of the chosen AMI meters is 20 years. The Company would note, other required infrastructure to support the AMI meters is expected to be 15 years. The useful life of the equipment is based off the design life provided by the manufacturer.

Witness: Stephen D. Blankenship

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KPSC 1_4 Refer to Kahn Direct Testimony, page 11, lines 3-6. Explain whether the lone vendor has given any indication that it is going out of business or plans to stop refurbishing automated manual read (AMR) meters. If so, provide any documentation indicating same.

RESPONSE

The lone vendor for the SCM+ platform has not provided any indication that it is going out of business. For clarification, the lone vendor for SCM+ does not provide refurbishing services. Those services are performed by a different company who has not indicated that they will stop refurbishing meters. That said, the Company is largely reliant on refurbished meters that have been removed as part of the Company's sister companies' AMI deployments and the supply of those meters will continue to be further limited as their AMI deployments are completed.

Witness: Stephen D. Blankenship

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- KPSC 1_5** Refer to Kahn Direct Testimony, page 11, lines 16-19.
- a. Once an AMR meter has been refurbished and placed back into service, explain its then current design life.
 - b. For a refurbished meter placed back into service, explain how Kentucky Power will depreciate that meter.

RESPONSE

- a. If a meter fails before its 15-year design life and refurbishment is successfully able to put a meter back in the field, there is no extension to the 15-year design.
- b. AMR meters are placed in service upon purchase and are retired from the Company's books when they are no longer used. Therefore, meters that are being refurbished continue to be depreciated while refurbishment occurs.

Witness: Stephen D. Blankenship

Witness: Lerah M. Kahn

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- KPSC 1_6** Refer to Kahn Direct Testimony, page 13, lines 2-9 and the Direct Testimony of Stephan D. Blankenship (Blankenship Direct Testimony), page 14, lines 9- 16.
- a. Provide a copy of the Request for Proposal (RFP) and the Request for Quote (RFQ).
 - b. Provide copies of Kentucky Power's evaluation of the RFP and RFQ, supporting the acceptance or rejection of any particular proposal or quote.

RESPONSE

- a. Please refer to KPCO_R_KPSC_1_6_Attachment1 for a copy of the RFP and KPCO_R_KPSC_1_6_Attachment2 for a copy of the RFQ.
- b. Please refer to KPCO_R_KPSC_1_6_ConfidentialAttachment3 for the requested information.

Witness: Stephen D. Blankenship

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DATA REQUEST

- KPSC 1_7** Refer to Kahn Direct Testimony, page 16, lines 21-24 and Blankenship Direct Testimony, page 5 lines 6-15, pages 10-13, and page 16, lines 1-9 and the Direct Testimony of Stevi N. Cobern (Cobern Direct Testimony), pages 8-10.
- a. With respect to “ongoing support of analytics and data warehousing,” provide a list of the data that can potentially be collected via the AMI meters, what programs or initiatives the data could or would be used to support, whether this full list of data collection capabilities will be initially programmed into each installed meter and, if not, what features Kentucky Power envisions will be initially programmed into the meters.
 - b. If the full suite of AMI meter data collection capabilities is not initially programmed into each installed meter, explain what the additional cost, if any, would be incurred to upgrade the meters’ programming to collect additional data.
 - c. Explain whether the AMI meters will support electric vehicle (EV) charging (no separate meter), greater penetration of rooftop solar, demand response or other behind the meter energy saving measures.

RESPONSE

- a. See KPCO_R_KPSC_1_7_Attachment 1 for a list of events available and what data will potentially be collected with AMI meters. Kentucky Power, at the outset of the AMI program, will only measure the values needed to bill each tariff. There will also exist some registers, or measurements, regarding voltage and current that will allow the Company to troubleshoot distribution equipment. These capabilities are inherent to AMI meter technology and require no additional programming.
- b. Upon installation, all data collection points are active and recording. Kentucky Power does not expect to incur any additional costs relating to the upgrade of meter aggregation capabilities; to the extent there are additional costs for those upgrades, the Company would expect those costs to be minimal.

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c. At this time, Kentucky Power will require a second meter in order to facilitate multiple tariff rates such as the addition of EV charging. Currently net metering customers have a single bi-directional meter. However, with the availability of a second processor and application interfaces that are being proposed by industry vendors, there exists a possibility where revenue grade load disaggregation becomes possible allowing for one meter to bill multiple rates and tariffs.

Witness: Stephen D. Blankenship

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KPSC 1_8 Refer to Blankenship Direct Testimony, page 7, lines 3-8. Explain the current failure rate of the current AMR meters for the years 2021-2024, by month and by manufacturer.

RESPONSE

Please refer to KPCO_R_KPSC_1_8_Attachment1 for the requested information. Please note that the overall failure rate is lower than the failure rate identified in the Direct Testimony of Company Witness Blankenship (25% vs 20%). This is because the Company used 2020-2023 for the Direct Testimony of Company Witness Blankenship.

Witness: Stephen D. Blankenship

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DATA REQUEST

KPSC 1_9 Refer to Kahn Direct Testimony, page 21, lines 16-21.

- a. Explain what is entailed in the inspection of the meter and service connection including how long a typical inspection is expected to take.
- b. Considering that the meter is going to be pulled and an AMI meter installed, explain why the service technician could not inspect the service connection and existing meter to ensure that there was no fraudulent use prior to installing the new AMI meter.

RESPONSE

- a. The Company notes that the referenced waiver request relates to inspection of the condition of the meter after the AMI meter is installed, not when the Company is replacing AMR meters with AMI. Specifically, 807 KAR 5:006 Section 14(3) requires an electric utility to conduct a physical inspection of the condition of its installed meter before making service connection to a new customer. The AMI meter that Kentucky Power proposed to install utilizes advanced tampering detection and remote monitoring capabilities to detect if a diversion situation is occurring. These technologies afford Kentucky Power the ability to investigate any prior or fraudulent use before a new customer takes service without the need to incur costs associated with a truck trip for a physical inspection.
- b. The Company would inspect the existing meter and associated equipment when replacing existing AMR meters with AMI meters. Please see subpart (a) for a further explanation of the Company's request for a waiver of inspections for new customers utilizing already installed AMI meters.

Witness: Stephen D. Blankenship

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KPSC 1_10 Refer to Kahn Direct Testimony, page 22, lines 1-6. Explain whether Kentucky Power is aware of the Commission granting the waiver request for other utilities that have undertaken AMI meter replacements. If so, identify the utilities and associated case numbers.

RESPONSE

Yes, the Company is aware of the Commission granting this waiver request for other utilities. In Case Nos. 2020-00349 and 2020-00350, the Commission's June 30, 2021, order approved a settlement agreement for Kentucky Utilities and Louisville Gas and Electric AMI CPCN filing that contained a waiver to deviate from the two-year inspection requirements in 807 KAR 5:006 Section 26(4)(e).

Witness: Lerah M. Kahn

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DATA REQUEST

KPSC 1_11 Refer to the Kahn Direct Testimony, Exhibit LMK-1 .

- a. Provide a breakdown of the individual components of Program Capital Costs and Avoided Capital Costs.
- b. Provide a breakdown of the estimated new operating and maintenance (O&M) expenses and O&M savings, including what factors Kentucky Power used to forecast the amounts. Provide any supporting work papers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
- c. Explain Energy Cost Impacts, how the impacts are realized and how they are forecast.
- d. Explain whether the cost to ratepayers of creating a regulatory asset was included in the cost benefit analysis. If it was not, explain why not.

RESPONSE

- a. Please see the Company's response to KPSC 1-2, Attachments 1 through 4, specifically the tabs following the "Costs>>" tab.
- b. Please see the Company's response to KPSC 1-2, Attachments 1 through 4, specifically the tabs following the "Costs>>" tab for O&M expenses and the tabs following the "Benefits>>" tab.
- c. Customer energy savings are realized when customers participate in engagement tools that are enabled by AMI and as a result, change their electric consumption behavior. Please see the Company's response to KPSC 1-2, Attachments 1 through 4, specifically the "Benefit Calculations" and "Cust Engagement Portal Benefits" tabs as well as the tabs following "Forecasts" for the Company's customer participation and impact forecasts.
- d. Confirmed, the costs related to the proposed regulatory asset are considered within the cost benefit analysis. Please see the Company's response to KPSC 1-2, Attachment 1 and 2, specifically the "Rev. Req." tab, lines "EBITDA" and "New O&M expenses."

Witness: Lerah M. Kahn

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DATA REQUEST

- KPSC 1_12** Refer to Kahn Direct Testimony, Exhibit LMK-1. Refer also to the Blankenship Direct Testimony, pages 8-10.
- a. Under the net present value (NPV) of Customer Impact, explain how benefits were calculated and forecast.
 - b. Provide the basis and support for the capital structure used in the four alternative analyses as compared to Kentucky Power's capital structure and return on equity approved in its last rate case. Include in the response the rationale for Kentucky Power assuming and projecting zero short term debt and 47.4 percent common equity.
 - c. Provide an update to Exhibit LMK-1 using the appropriate costs and capital structure approved in Kentucky Power's last rate case.

RESPONSE

- a. The Company's cost benefit analysis considered four benefit categories for inclusion:

Avoided Capital

This category of benefits is associated with avoided capital costs that would be incurred with maintaining the status quo – running existing AMR system to failure and upgrading to SCM+ on a reactive basis. The costs associated with this were not forecasted. Rather, the Company utilized the RFQ to inform the inputs. Please see the Company's response to KPSC 1-2, Attachments 1 and 2, specifically tabs "Benefit Calculations" and "Avoided Costs AMR SCM+ Reactive."

Avoided O&M

This category of benefits is associated with the costs saved through the ability of the AMI technology to eliminate meter reads and disconnect/reconnect trips as well as efficiencies within outage management and billing estimation. The inputs utilized for this category of benefits were informed by the Company's current experience. Please see the Company's response to KPSC 1-2, Attachments 1 and 2, specifically tabs "Benefit Calculations" and "Benefit Inputs."

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Revenue Protection

This category of benefits is associated with the costs saved through the ability of the AMI technology to reduce tampering and theft and the consumption of energy on inactive meters. These inputs rely on both the Company's current experience and forecasted information. Specifically, energy forecasts, price forecasts, and PJM power and capacity forecasts. Please see the Company's response to KPSC 1-2, Attachments 1 and 2, specifically tabs "Benefit Calculations," "Benefit Inputs," "Energy Forecasts," "Annual Prices-Nominal," and "Price Forecasts."

Energy Efficiency

Please see the Company's response to KPSC 1-11(c) for more detail.

b. and c. The Company utilized the capital structure approved in the Company's most recent base rate case (Case No. 2023-00159). Notably, the capital structure is utilized within two lines: Net Income and Interest.

For Net Income, the 47.4% represents a combination of the Company's approved common equity (41.24%) and short-term debt (6.14%). The Net Income line provides the Company's expected return on its investment and applying the combined 47.4% was a conservative approach. Similarly for the Interest line item, the Company solely utilized long-term debt to be conservative.

Nonetheless, please see KPCO_R_KPSC_1_12_ConfidentialAttachment1 through KPCO_R_KPSC_1_12_ConfidentialAttachment4 which are all the same workpapers provided within KPSC 1-2 except for Net Income utilizing only the equity rate and for Interest using a combination of long-term and short-term date. The results of these two changes are the "NPV of Customer Impact" is further reduced and the "Total Resource Cost Test" score increased for both AMI options. Please see the below which provides the original Table LMK-1 and a revised Table LMK-1 to show a snapshot of the differences caused by these two changes.

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Original Table LMK-2

	1	2	3	4
	AMI Proactive Deployment	AMI Reactive Deployment	SCM+ Proactive Deployment	SCM+ Reactive Deployment
Costs	22.1	23.8	57.0	52.4
Quantifiable Savings	61.4	52.5	0.0	0.0
Customer Impact (Costs less Savings)	-39.3	-28.7	57.0	52.4
TRC Test (Savings divided by Costs)	2.78	2.21	0	0

Revised Table LMK-2

	1	2	3	4
	AMI Proactive Deployment	AMI Reactive Deployment	SCM+ Proactive Deployment	SCM+ Reactive Deployment
Costs	21.8	23.4	56.2	51.5
Quantifiable Savings	61.4	52.5	0.0	0.0
Customer Impact (Costs less Savings)	-39.6	-29.1	56.2	51.5
TRC Test (Savings divided by Costs)	2.81	2.24	0	0

Witness: Lerah M. Kahn

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DATA REQUEST

KPSC 1_13 Refer to Blankenship Direct Testimony, page 7, lines 3-8.

- a. Explain whether Kentucky Power's AMR meters are failing at the rate of approximately 3,000 per year.
- b. Assuming the Commission grants Kentucky Power's request to install AMI meters, explain how the failed AMR meters will be replaced following the Commission's Order and when AMI meters will begin being installed.
- c. Assuming the Commission grants Kentucky Power's request to install AMI meters, explain how the failed AMR meters will be replaced during the four- year period of actual AMI installation.

RESPONSE

a. Kentucky Power is required to test (807 KAR 5:041 and 807 KAR 5:006) about 5.2% of its meter inventory annually, which translates to approximately 8,361 meters (2021-2024). During these tests, it is observed that about 20-25% of the meters fail. This failure rate indicates that approximately 1,700 meters are deemed unfit for use each year.

While the Company identifies a substantial number of meter failures during mandatory testing, it also needs to account for general failures that occur as a result of the age of the meters in service. The Company estimates that it requires approximately 3,000 new meters each year to cover both the failures found from mandatory field testing and the ongoing general failure rates.

In summary, while Kentucky Power's AMR meters are failing at a rate of about 1,700 meters annually due to testing, the overall need for 3,000 meters annually reflects a need to address both mandatory testing failures and aging infrastructure. This approach is essential for maintaining reliable service and ensuring that the Company can effectively manage its meter inventory. Based on the age of the Company's current infrastructure, we expect to replace even more meters going forward. Please also see the Company's response to KPSC 1-8.

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b. and c. Assuming the Commission grants Kentucky Power's request to proactively install AMI meters, AMR meters will be replaced systematically by circuit and billing cycle with AMI meters. Accordingly, if an AMR meter fails and the AMI infrastructure in that area has not been installed yet, it will be replaced with AMR meters in accordance with the Company's operating procedures until such time that AMI deployment occurs.

Witness: Stephen D. Blankenship

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DATA REQUEST

KPSC 1_14 Refer to Kahn Direct Testimony, Figure LMK-1, page 6. Provide clarification for the following for each specified city (Ashland, Pikeville, and Hazard). State whether AMI meters will then be deployed in the remaining portions of each county outside the named city limits. If yes, identify when the deployment for each county would occur. If not, explain why not.

RESPONSE

The Company divides its service territory into three service districts named for the main city in each district - Ashland, Pikeville, and Hazard. Please see KPCO_R_KPSC_1_14_Attachment1 for a map illustrating these service district areas. Note that the Paintsville and South Williamson areas are considered as a part of the Pikeville district while Whitesburg is considered a part of the Hazard district. The references in Figure LMK-1 were to the Company's service districts, not the cities for which the districts are named.

The counties assigned to each district are as follows:

Ashland district (2026)

- Boyd
- Carter
- Elliott
- Greenup
- Lawrence
- Lewis
- Rowan

Pikeville district (2027, *except for 25% which will be completed in 2029)

- Floyd* (eastern portions in 2029)
- Johnson
- Magoffin
- Martin* (all in 2029)
- Morgan
- Pike* (eastern portions in 2029)

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Hazard district (2028)

- Breathitt
- Clay
- Knott
- Leslie
- Letcher
- Owsley
- Perry

Witness: Stephen D. Blankenship

Witness: Lerah M. Kahn

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DATA REQUEST

KPSC 1_15 Confirm that Kentucky Power believes that installation in the named cities referenced in Figure LMK-1, page 6 is the most beneficial way to install the new AMI meters.

RESPONSE

Confirmed. Please also see the Company's response to KPSC 1-14 regarding the reference to Kentucky Power's service districts in Figure LMK-1 and the Direct Testimony of Company Witness Kahn's testimony on page 5 line 14 describing how the Company will be focusing on economies of scale such as starting in densely populated regions first.

Witness: Stephen D. Blankenship

Witness: Lerah M. Kahn

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DATA REQUEST

KPSC 1_16 Refer to Kahn Direct Testimony, page 12. Based on the statements provided, explain how Kentucky Power will depreciate the new AMI meters.

RESPONSE

Depreciation for AMI Meters will commence in the month after they are initially placed in service. Depreciation on the new AMI meters will be calculated using a depreciation rate that is developed using the average service life of the new meters (expected to be 15 years) and that is approved by this Commission.

Witness: Lerah M. Kahn

Kentucky Power Company
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DATA REQUEST

KPSC 1_17 State whether Kentucky Power intends to request approval for updated depreciation rates in its next base rate case.

RESPONSE

As part of preparing its next base rate case, the Company plans to evaluate whether its current depreciation rates need to be updated; however, the Company will not make a decision on whether to seek approval for updated depreciation rates until it is closer to filing a rate case application.

Witness: Lerah M. Kahn

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DATA REQUEST

KPSC 1_18 For each alternative and the proposed project, state whether Kentucky Power would provide the labor for the replacements of the meters using existing personnel or if the labor will be contracted outside of the utility.

RESPONSE

For all reactive scenarios discussed in the case, Kentucky Power would use internal labor. For proactive scenarios discussed in the case, Kentucky Power will use contractors for a majority of the labor while utilizing some internal labor.

Witness: Stephen D. Blankenship

VERIFICATION

The undersigned, Stephen D. Blankenship, being duly sworn, deposes and says he is the Region Support Manager, for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Signed by:
Stephen D. Blankenship
ABC618A602E24C1...

Stephen D. Blankenship

Commonwealth of Kentucky)
)) Case No. 2024-00344
County of Boyd)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Stephen D. Blankenship, on 12/12/2024 | 12:28 PM EST.

Signed by:
Michelle Caldwell
E9B1BC7AC31F421...

Notary Public

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

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

Certificate Of Completion

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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

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

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

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Envelope Updated	Security Checked	12/12/2024 12:21:50 PM
Certified Delivered	Security Checked	12/12/2024 12:27:57 PM
Signing Complete	Security Checked	12/12/2024 12:28:39 PM
Completed	Security Checked	12/12/2024 12:28:59 PM

Payment Events	Status	Timestamps
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Electronic Record and Signature Disclosure

VERIFICATION

The undersigned, Lerah M. Kahn, being duly sworn, deposes and says she is the Manager of Regulatory Services for Kentucky Power, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Lerah M. Kahn

Lerah M. Kahn

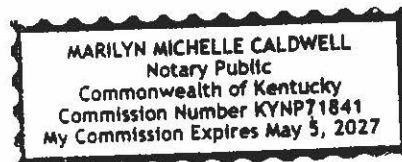
Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2024-00344

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Lerah M. Kahn, on December 17, 2024

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027



Notary ID Number KYNP71841