

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION TO CONSIDER)	
DEVIATION OF REGULATION 807 KAR 5:041,)	
SECTION 7, VOLTAGE SURVEYS AND)	Case No. 2025-00131
RECORDS)	

MOTION FOR DEVIATION

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001, Section (22), and the Commission’s April 1, 2026 Order in this proceeding (“Order”) for an order granting a deviation from the requirements of 807 KAR 5:041, Section 7 following installation of advanced metering infrastructure. As described below, good cause exists to grant this deviation.

DISCUSSION

807 KAR 5:041, Section 7 requires that:

(1) Every utility shall have two (2) or more portable indicating voltmeters and two (2) or more recording or graphic voltmeters of type and capacity suited to the voltage supplied. Every utility shall make a sufficient number of voltage surveys to indicate the service furnished from each center of distribution. To satisfy the commission of its compliance with voltage requirements, each utility shall keep at least one (1) of these instruments in continuous service at some representative point on its system. All records of the most recent voltage surveys taken within the last three (3) calendar years shall be available for inspection by the utility's customers and commission staff.

(2) Each graphic recording voltmeter shall be checked with a working standard indicating voltmeter when it is placed in operation and when it is removed, or periodically if the instrument is in a permanent location. Notations on each chart shall indicate beginning time and date of registration and when the chart was removed, as well as the point where voltage was taken, and results of the check with indicating voltmeter.

In the Order, the Commission concluded that “a deviation allowing the use of voltage data from an AMI system to meet the current regulation, 807 KAR 5:041, Section 7, requirements would be appropriate.”¹ The Commission called for utilities with AMI capabilities sufficient to allow for the deviation and with a desire to avail itself of this deviation, to file a motion seeking the same within 21 days of the Order.²

In Case No. 2024-00344, the Commission authorized the Company to deploy AMI meters in its service territory. The AMI meters that the Company is installing in the service territory will allow the Company to monitor voltage for every customer in real time.³ The AMI meters’ ability to monitor and record voltage throughout the system give the Company the ability to satisfy the voltage compliance requirements in 807 KAR 5:041, Section 7.⁴ Additionally, the AMI system being installed will allow the Company to continue to retain all records of voltages on the system for three years for inspection by the Commission and customers.⁵

Accordingly, good cause exists for the Commission to grant Kentucky Power a deviation from the requirements of 807 KAR 5:041, Section 7 following installation of advanced metering infrastructure.

WHEREFORE, Kentucky Power Company respectfully requests the Commission to enter an Order:

1. Granting Kentucky Power a deviation from the requirements of 807 KAR 5:041, Section 7 following installation of advanced metering infrastructure; and

¹ Order at 6.

² *Id.* at 6-7.

³ *See*, Kentucky Power’s Response to Commission Staff Data Request 1-12.

⁴ *Id.*

⁵ *See*, Kentucky Power’s Response to Commission Staff Data Request 1-13

2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "K. J. Gish, Jr.", enclosed within a large, loopy blue oval.

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