DATA REQUEST

KPSC 1_1 State whether the electric utility currently has advanced metering infrastructure (AMI) capabilities in place.

RESPONSE

No, currently Kentucky Power utilizes Automated Meter Reading (AMR). The Company has a pending application before the Commission (Case No. 2024-00344) seeking a certificate of public convenience and necessity (CPCN) to replace its existing AMR meter system with an AMI meter system.

DATA REQUEST

KPSC 1_2 State whether the electric utility has AMI equipment and software with the capability to monitor and record voltage of an individual customer over a determined period of time.

RESPONSE

No, currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system. If approved by the Commission, the proposed AMI system will be able to monitor and record voltage of an individual customer over a determined period of time.

DATA REQUEST

KPSC 1_3 State whether the utility has other equipment on the system that can also monitor and record voltage.

RESPONSE

Yes. Currently, the Company utilizes Power Monitors Incorporated recording voltmeters, load research meters, and Supervisory Control and Data Acquisition ("SCADA") to monitor and record voltage.

DATA REQUEST

KPSC 1_4 State if the ability to monitor and record voltage of individual customers is as accurate as equipment required by 807 KAR 5:041, Section 7, and if so, state how this is determined.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system.

All new AMI meters will have factory certified tests, and the Company intends to sample test new meters upon receipt utilizing the American National Standards Institute (ANSI) Z.1.9 standard to ensure accuracy, as is currently done with the Company's AMR meters. ANSI Z.1.9 is the industry standard for meter accuracy testing.

DATA REQUEST

KPSC 1_5 State if the utility intends to perform ongoing tests of the accuracy of the AMI voltage recordings and describe the intended process.

RESPONSE

The Company currently performs, and will continue performing, all required sampling and periodic meter testing as well as sample testing of all new meters.

Please also see the Company's response to KPSC 1_4.

DATA REQUEST

KPSC 1_6 State how the tests will be recorded, how long the records for each test will be kept, and if the records will be maintained in a manner that can be inspected by utility customers and the Commission or its staff.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system.

All voltage and testing data for the Company's current AMR system are kept for at least three years in a manner that can be inspected by utility customers and the Commission or its Staff. The same process will continue for the Company's current AMR system and under the Company's proposed AMI system.

DATA REQUEST

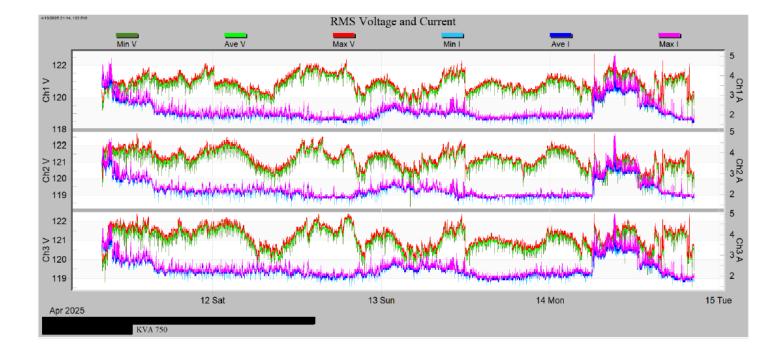
KPSC 1_7 Provide an example of what the AMI voltage surveys and recordings look like as recorded by the AMI system, as well as an example of the current voltage surveys and recorders installed at various locations on your system.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system. Accordingly, an example for AMI is not available.

Please see KPCO_R_KPSC_1_7_Attachment1 for an example for the Company's current voltage surveys and recordings for its AMR system.

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DATA REQUEST

KPSC 1_8 State if the AMI voltage recording hardware and software have the ability to take continues readings, or if readings will be taken at set intervals.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system.

The Company's proposed AMI voltage recording hardware and software have the ability to take continuous readings or interval readings.

DATA REQUEST

KPSC 1_9 State whether the AMI system and/or software have the ability to detect exceptions that are out of limits, like voltage limits.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system.

The Company's proposed AMI system has the ability to detect exceptions that are out of limits.

DATA REQUEST

KPSC 1_10 State whether the AMI system monitors and/or records other exceptions other than voltage.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system.

The Company's proposed AMI system monitors and/or records other exceptions other than voltage.

DATA REQUEST

KPSC 1_11 State whether the electric utility would benefit from a deviation of the requirement in 807 KAR 5:041, Section 7, and if so, in what way.

RESPONSE

Currently Kentucky Power utilizes AMR. The Company has a pending application before the Commission (Case No. 2024-00344) seeking a CPCN to replace its existing AMR meter system with an AMI meter system.

With respect to the Company's AMR system, a deviation is not required as the Company is currently complying with that regulation and would need that equipment to provide the voltage surveys required.

However, based on the real-time operations data available with AMI, the Company does not feel that two or more portable indicating voltmeters and two or more recording or graphic voltmeters are required as the information provided by the AMI technology would be sufficient to satisfy the voltage survey requirements.

DATA REQUEST

KPSC 1_12 State whether the electric utility will have the ability to satisfy the Commission of its compliance with voltage requirements if a deviation from 807 KAR 5:041, Section 7 is granted, and if so, state how.

RESPONSE

Yes. If the Company's AMI application is approved, the Company will be able to monitor voltage for every customer in real time. In addition, the Company can select points across its system and record detailed voltage analysis as needed.

Please also see the Company's response to KPSC 1_11.

DATA REQUEST

KPSC 1_13 If a deviation to the requirements of 807 KAR 5:041, Section 7 is granted, state whether the electric utility will still be able to retain all records of the voltage records and surveys taken with in the last three calendar years and allow inspection by the utility's customers and the Public Service Commission.

RESPONSE

Yes, if a deviation is granted, Kentucky Power will still be able to retain all records of the voltage records and surveys taken within the last three calendar years and allow inspection by the utility's customers and the Public Service Commission.

Please also see the Company's response to KPSC 1_6.

VERIFICATION

The undersigned, Stephen D. Blankenship, being duly sworn, deposes and says he is the Distribution Emergency Preparedness 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.

toph Blankensting

Stephen D. Blankenship

Commonwealth of Kentucky)) County of Boyd)

Case No. 2025-00131

Subscribed and sworn to before me, a Notary Public in and before said County

and State, by <u>Stephen D. Blankenship</u>, on <u>June 23, 2025</u>.

hom michelle Caldwelle

My Commission Expires May 5, 2027

MARILYN MICHELLE CALDWELL Notary Public Commonwealth of Kentucky Commission Number KYNP71841 My Commission Expires May 5, 2027

Notary ID Number <u>KYNP71841</u>