

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) A GENERAL	)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC	)	
SERVICE; (2) APPROVAL OF TARIFFS AND	)	CASE NO. 2025-00257
RIDERS; (3) APPROVAL OF CERTAIN	)	
REGULATORY AND ACCOUNTING	)	
TREATMENTS; AND (4) ALL OTHER REQUIRED	)	
APPROVALS AND RELIEF	)	

**SUPPLEMENTAL REQUESTS FOR INFORMATION OF JOINT
INTERVENORS APPALACHIAN CITIZENS' LAW CENTER,
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR
ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION TO KENTUCKY
POWER COMPANY**

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Kentucky Solar Energy Society, and
Mountain Association*

Dated: October 23, 2025

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any

other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company", "Kentucky Power Company", or "KPCo", means Kentucky Power Company, their parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. "Joint Movants" means Joint Movants for Joint Intervention, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association who have moved for the status of full intervention as joint intervenors in this matter.
13. Unless otherwise specified in each individual request the term "tariff" means the tariffs as filed in this matter by KPCo.
14. "Commission" or "PSC" means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Movants. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).
8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in

sufficient detail so as to permit Joint Intervenor or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a "privilege log" that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenor or the Commission to evaluate the validity of such claims.

9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**SUPPLEMENTAL REQUESTS FOR INFORMATION OF JOINT
INTERVENORS APPALACHIAN CITIZENS' LAW CENTER,
KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR
ENERGY SOCIETY, AND MOUNTAIN ASSOCIATION TO KENTUCKY
POWER COMPANY**

Joint Intervenors hereby tender the following supplemental requests for information to the Company:

- 2.1. Please refer to the Direct Testimony of Tanner S. Wolffram on Behalf of Kentucky Power Company ("Wolffram Direct") at page 18 lines 10-16 ("at 18:10-16") and explain:
 - a. Why is the current net book value of \$537 million for Mitchell greater than the net book value at the time of acquisition twelve years ago?¹
 - b. The original net book value of the Mitchell plant at the time of acquisition of KPCo's interest that was:
 - i. Related to flue gas desulfurization (FGD),
 - ii. Non-FGD environmental-related (or recoverable through the environmental surcharge),
 - iii. Related to asset retirement costs, and
 - iv. Non-environmental plant;
 - c. What were the depreciation rates at the time of acquisition for each portion above; and
 - d. Current net book value and depreciation rates related to each expense above.
- 2.2. Please refer to Wolffram Direct at 19:8-13, and explain why only non-environmental costs are sought to be recovered through the proposed "Generation Rider."

¹ See Case No. 2012-00578, *Application of Kentucky Power Company for (1) a Certificate of Public Convenience and Necessity Authorizing the Transfer to the Company of an Undivided Fifty Percent Interest in the Mitchell Generating Station and Associated Assets; (2) Approval of the Assumption by Kentucky Power Company of Certain Liabilities in Connection with the Transfer of the Mitchell Generating Station; (3) Declaratory Rulings; (4) Deferral of Costs Incurred in Connection with the Company's Efforts to Meet Federal Clean Air Act and Related Requirements; And (5) All Other Required Approvals and Relief*, Final Order at 9 (Oct. 07, 2013) ("The proposed Mitchell transfer is scheduled to close on December 31, 2013, based on a projected NBV of \$536 million, or \$687 per kW.").

- 2.3. Please refer to Wolfram Direct at 21:18-21 and explain whether only non-environmental costs are being pursued for securitization.
- a. If yes, explain why.
 - b. If no, explain why only non-environmental costs are sought to be included in the proposed "Generation Rider."
- 2.4. Please refer to Wolfram Direct at 21:4-6, and explain:
- a. How including the revenue requirement for the environmental surcharge in the "Generation Rider" would cause "confusion and unnecessary complexity in calculating the revenue requirement for the proposed Generation Rider"?
 - b. Please also refer to the Direct Testimony of John D. Cullop on Behalf of Kentucky Power Company ("Cullop Direct") at 8:2-5, and explain whether all environmental costs related to Mitchell will remain in base rates, or whether any costs will be recovered directly through the environmental surcharge, or elsewhere. List any environmental costs, and the amount, not to be recovered through base rates, and how they will be recovered.
- 2.5. Please refer to Wolfram Direct at 22:5-15 and explain
- a. Why would updating undepreciated plant balance annually through the proposed "Generation Rider" would benefit ratepayers?
 - b. Why would not updating the depreciation rates for the Mitchell Plant at this time "result[] in a roughly \$11 million reduction to the Company's cost-of-service in this proceeding"?
- 2.6. Please refer to Wolfram Direct at 23:18-21, and Exhibit TSW-2 and explain:
- a. Any difference in recovery of costs for Mitchell through the proposed generation rider and recovery through currently-approved mechanisms, by class and amount;
 - b. Does the column "Difference (11) = (10) - (6) - (7)" in Exhibit TSW 2 at page 2 of 2 represent the difference between test year recovery and proposed recovery under the Generation Rider?
 - c. How was the "Test Year CP / kWh Ratio" in Exhibit TSW-2 at page 2 of 2 derived?
 - d. How were "Allocated Demand Related Costs" derived?

- e. How were “Allocated Energy Related Costs” derived, and why is the value \$0 for each class?
 - f. How were Why is the “\$/kWh Rate” for Classes LGS and IGS is \$0?
- 2.7. Please refer to Wolfram Direct at 25:12 - 29:8, and explain how the changes to Tariff P.P.A. relate to or are affected by the changes to that tariff in the filing under investigation in Commission Case No. 2025-00307.
- 2.8. Please refer to Wolfram Direct at 26:6-9, and detail the “additional costs associated with asset retirement obligations (“ARO”)” incurred since Case No. 2023-00159 related to the Big Sandy facilities.
- 2.9. Please refer to Wolfram Direct at 27:12-21, and provide the actual amount of gains and losses on “incidental sales” of gas in each of the past five years.
- 2.10. Please refer to Wolfram Direct at 27:12-21 and 28:4-10, and:
- a. Explain the Company strategy regarding forward purchase of gas;
 - b. Explain whether the Company has reevaluated that strategy in light of the “significant volatility in the natural gas market in recent years;” and
 - c. Provide any investigation, documentation, or reporting related to previous strategy and/or reevaluation.
- 2.11. Please refer to Wolfram Direct at 28:11-18, and explain:
- a. If a change to tariff P.P.A. is required to allow for recovery of losses on incidental sales of gas;
 - b. If so, why the change is being proposed to Tariff P.P.A. rather than the fuel adjustment clause; and
 - c. The frequency and level of Commission review of Company recovery through Tariff P.P.A., especially as it compared to review of FAC charges/
- 2.12. Please refer to Wolfram Direct at 28:5-10, and 31:9-22, regarding the causes and “extraordinary” nature of the \$1.9 million in incidental gas sales losses, and explain:
- a. What steps has the Company taken to reevaluate its gas purchases and hedging in light of the extraordinary losses in the test year?
 - b. Is this the first year in which the Company has seen losses on such incidental sales of gas?

- c. Please provide the records of such incidental sales, the fixed-price forward-month contract amounts for any such purchases being resold, and the net loss or gain on a monthly basis for each month for each of the most recent five years available.

2.13. Please refer to Wolfram Direct at 28:11-18 and explain:

- a. Why is recovery of gains or losses related to incidental sales of gas through the fuel adjustment clause not appropriate?
- b. What would be the impact of recovery through the fuel adjustment clause as compared to Tariff P.P.A.?
- c. Would recovery through the fuel adjustment clause allow for more frequent adjustments?
- d. Would recovery through the fuel adjustment clause allow for more frequent review by the Commission?

2.14. Please refer to Wolfram Direct at 29:11-19, and the Commission's Order dated January 19, 2024 in Case No. 2023-00159 at 15-16, approving settlement recovery of NOLC regulatory liability "in the first base rate case filed after the private letter ruling from the IRS is received." Given that the Company has not yet received a PLR, why is the Company proposing to modify the Tariff F.T.C. to allow recovery of the regulatory asset associated with NOLC ADIT?

2.15. Please refer to Wolfram Direct at 31:20 - 32:3, and explain:

- a. Is a prepay program the only program being pursued to enhance the benefits of AMI?
- b. Is a prepay program the only program evaluated to enhance the benefits of AMI?
- c. Please detail any other programs evaluated and/or being pursued, and provide any related evaluation or program implementation documentation in the possession of the Company.

2.16. Please refer to Wolfram Direct at 33:21-23 and 36:16-19, and

- a. Compare and contrast the test-year storm damage cost of \$23.0 million, \$23.2 million of current deferrals associated with those events, and the \$23.3 million in current deferrals inclusive of the deferral application pending in Case No. 2025-00264.

- b. What is in each amount that is not included in the others?
 - c. Explain how the Company has a test-year storm expense of (\$215,408). Were actual expenses lower than those accrued in approved regulatory assets?
- 2.17. Please refer to the Direct Testimony of Robert A. Jessee on Behalf of Kentucky Power Company (“Jessee Direct”) at Figure RAJ-4, and confirm what share of the total expense for each project is represented by the amounts, and what share other AEP affiliates or other entities have expended on each project.
- 2.18. Please refer to Jessee Direct at Figure RAJ-4, and detail which projects, if any, were the subject of Certificate of Public Convenience and Necessity (CPCN) applications submitted to the Commission, with case numbers. For any project not the subject of a CPCN application explain why not.
- 2.19. Please refer to Jessee Direct at 13:20 to 24:7, and provide:
- a. Equivalent Unplanned Forced Outage Rates for the Mitchell plant for each of the last five (5) years;
 - b. Hourly sulfur dioxide (SO₂) for Mitchell, by unit, for each of the last five (5) years;
 - c. Hourly heat rate for Mitchell, by unit, for each of the last five (5) years;
 - d. SO₂ emissions allowance allocation, sale, and transfer amounts and prices for each of the last five (5) years by Program; and
 - e. The air pollution permitting application and permit for the project.
- 2.20. Please refer to Jessee Direct at 14:22 to 15:5, and explain how the boiler exit gas duct replacement expense is affected by the decision to modify in place.
- 2.21. Please refer to Jessee Direct at 17:6-15, and explain whether any carrying costs are were assigned to the Company or included in base rates or environmental rates in this case related to costs allocated asymmetrically to Wheeling Power that may be shifted back to the Company.
- 2.22. Please refer to the Direct Testimony of Michele Ross on Behalf of Kentucky Power Company (“Ross Direct”) at 4:7-10 and 5:21 to 6:14, and
- a. Provide any documents in which the Company has evaluated its service territory terrain and vegetative conditions to other utilities in the Commonwealth or outside the Commonwealth.

b. Explain where the Company ranks regarding number of customers per mile of:

i. Transmission circuit compared to other

1. Utilities in the Commonwealth

2. Utilities within the US

ii. Distribution circuit compared to other

1. Utilities in the Commonwealth

2. Utilities within the US

2.23. Please refer to Ross Direct at 15:7-17, and explain:

a. How right-of-way is defined or determined;

b. Once widened does an area become inside right-of-way?

c. Will TIR cost go up with widened rights-of-way?

2.24. Please refer to Ross Direct at 16, Figure MR-5, and explain why TOR cost was significantly lower in 2024 than past years.

2.25. Please confirm that the Company is not seeking any cost recovery for AMI deployment in this case. If any cost recovery is being sought, please explain and provide details on any recovery being sought.

2.26. Please confirm that the Company will not seek cost recovery for the deployment of AMI until deployment is completed and the Company can assess what, if any, costs have been incurred over savings.

2.27. Please confirm that the Company will not implement any changes in disconnection or reconnection policies related to AMI except in a future case and after review and approval by the Commission.

2.28. Please refer to the Direct Testimony of Stevi N. Cobern on Behalf of Kentucky Power Company ("Cobern Direct") at 18:13-19 and the response to Joint Intervenor's First Set of Data Requests number 40 ("JI 1-40"), and explain whether the Company tracks how many customers receive HEART and THAW funding.

a. If yes, provide the number of customers receiving funding from each program;

b. If now, why not?

- 2.29. Please refer to the Direct Testimony of John D. Cullop on Behalf of Kentucky Power Company ("Cullop Direct") at 2:9-13 and 8:2-5, as well as the Final order entered on October 07, 2013 in Case No. 2012-00578 allowing for FGD costs for Mitchell to be "recovered through the environmental surcharge (Tariff ES.) ... at least until the Commission sets new base rates for a period commencing after June 30, 2020," and explain:
- a. Why the Company proposing to continue excluding Mitchell FGD costs from the base environmental revenue calculation; and
 - b. What the impact on each tariff class is of collecting the rates through this mechanism rather than base rates
- 2.30. Please refer to Cullop Direct at 8:6 through 10:2, and explain whether each amount removed related to Mitchell FGD was or would be collected through the environmental surcharge.
- 2.31. Please refer to the Direct Testimony of Jaclyn N. Cost ("Cost Direct") at 5:18 to 6:9 and the Direct Testimony of Nicole M. Coon on Behalf of Kentucky Power Company ("Coon Direct") at 5:13-23, and confirm whether transmission and distribution costs are affected by the amount of energy used. If anything but confirmed, explain.
- 2.32. Please refer to Coon Direct at 10:2-8, and provide the dates and level of the 12 CPs used to allocate production plant. Explain whether each was weather-normalized.
- 2.33. Please refer to Coon Direct at 10:15-19, and provide the dates and level of the 12 CPs used to allocate transmission plant. Explain whether each was weather-normalized.
- 2.34. Please refer to Coon Direct at 10:21 to 11:3, and provide the dates and level of the 12 CPs used to allocate distribution plant. Explain whether each was weather-normalized.
- 2.35. Please refer to the Direct Testimony of Michael M. Spaeth on Behalf of Kentucky Power Company ("Spaeth Direct") at 5:7-12, and confirm the base fuel rate changed during the test period from \$0.0261 \$/kWh to \$0.03880 \$/kWh.
- a. How was this change incorporated into proposed base rates? I.e., was this incorporated on a pro rata basis over the test period, or was only the later rate used?
 - b. Confirm this represents a greater than 48% increase in fuel costs

- i. If anything other than confirmed, explain;
 - ii. If confirmed, please explain the cause of this increase.
- 2.36. Please refer to Spaeth Direct at 6:16-18 and 7:3-10, and explain what costs are meant by “non-Mitchell FGD”? What other units operated by the Company have flue gas desulfurization?
- 2.37. Please refer to Spaeth Direct at 9:5-9, and explain which functional and class categorizations are “basic service-related”?
- 2.38. Please refer to Spaeth Direct at 10:16-21, and explain how the cost associated with connecting a residential customer to the distribution system of \$46.19 was derived, including what categories of costs were included.
- 2.39. Please refer to Spaeth Direct at 11:10-12 and, e.g., Response to JI 1-50, and explain how the Company determined lower income customers are disadvantageded by the current basic service charge given that the Company “does not maintain customer income information.”
- 2.40. Please refer to Spaeth Direct at 12:10-15, and provide:
 - a. The number of customers using electric heating;
 - b. The number of customers using electric heating via heat pumps;
 - c. The number of customers using electric heating via resistance heating; and
 - d. The number of customers using electric heating via any other means.
- 2.41. Please refer to Spaeth Direct at 16:8-20, and:
 - a. Provide the number of customers using under 600 kWh;
 - b. Confirm the increased energy charge for usage under 600 kWh is a fixed increase in total cost for any customer using greater than 600 kWh
- 2.42. Please refer to Spaeth Direct at 17:3-4, and explain how demand-related costs are fixed.
- 2.43. Please refer to the Direct Testimony of Franz D. Messner on Behalf of Kentucky Power Company (Messner Direct) at Figured FDM-1, and confirm whether the current per books capital structure matches that approved in the Company’s previous base rate case. If anything but confirmed, explain the reason for any difference.

- 2.44. Please refer to Messner Direct at 10:13-14, and explain the impact of exclusion of sale of accounts receivable.
- 2.45. Please refer to Messner Direct at 12:1-20, and provide the amount of the issuance expense.
- 2.46. Please refer to the Direct Testimony of Adrien M. McKenzie, CFA, on Behalf of Kentucky Power Company ("McKenzie Direct") at 10:19-20, and explain whether attrition alone explains the Company's inability to earn its authorized rate of return. If anything but confirmed, explain each reason for the Company's inability to earn its authorized rate of return and the relative contribution.
- 2.47. Please refer to McKenzie Direct at 21:6-7, and explain why only utilities that have paid a common dividend and have not announced a dividend cut are included in the proxy group.
- 2.48. Please refer to McKenzie Direct at 25:7-19, and to the extent able quantify the impact of the high concentration of sales to industrial customers relative to other utilities impacts risk and the proposed return on equity.
- 2.49. Please refer to McKenzie Direct at 29:19 to 30:2, and explain:
- a. How has the Company considered mitigating the "elevated carbon transition risks due to its significant coal-fired generation"?
 - b. Has the Company attempted to quantify the impact of the elevated risk on the proposed return on equity?
 - i. If yes, please provide documentation;
 - ii. If no, why not?
- 2.50. Please refer to the Supplemental Direct Testimony of Alex E. Vaughn on Behalf of Kentucky Power Company in Case No. 2025-00175, *Electronic Application Of Kentucky Power Company For Approval Of (1) A Certificate Of Public Convenience And Necessity To Make The Capital Investments Necessary To Continue Taking Capacity And Energy From The Mitchell Generating Station After December 31, 2028, (2) An Amended Environmental Compliance Plan, (3) Revised Environmental Surcharge Tariff Sheets, And (4) All Other Required Approvals And Relief*, and respond to the following questions:
- a. Please state and itemize what costs related to the Mitchell Plant Unit 2 cooling tower structural needs, if any, are included in the adjustments to the test year expense included in this case?

- b. Please explain how, if at all, the test year level of expense is impacted by the update provided by Mr. Vaughn in his Supplemental Direct Testimony in Case No. 2025-00175?
- c. Please provide a detailed account of the cost of each of the Options 1-4 described by Mr. Vaughn in his Supplemental Direct Testimony in Case No. 2025-00175 at 3:3-9?
- d. Please explain how the adjustments to the test year level of expense in this case would be impacted by each of the Options 1-4 described by Mr. Vaughn in his Supplemental Direct Testimony in Case No. 2025-00175 at 3:3-9?
- e. Please explain whether the costs related to each of the Options 1-4 described by Mr. Vaughn in his Supplemental Direct Testimony in Case No. 2025-00175 at 3:3-9 would be included or eligible to be included in the proposed Generation Rider (Tariff G.R.) in this case, broken down by expense and by each of:
 - i. RB = Non-Environmental Rate Base for Mitchell represented by the sum of plant in service less accumulated depreciation;
 - ii. CWIP = Construction Work in Progress for Non-Environmental Mitchell Projects;
 - iii. ROR = Rate of Return on Non-Environmental Mitchell Rate Base;
 - iv. DE = Depreciation Expense;
 - v. PT = Property Taxes;
 - vi. OU = Cumulative difference between revenues received and actual costs for the reporting period, representing the (over) or under recovery.

- 2.51. Please refer to the presentation given in the informal technical conference ("ITC") on Sept. 30, 2025 at slide 7 ("RESIDENTIAL RATE PROPOSAL"), and explain any efforts the Company has made to reach out to the following groups of residential ratepayers regarding high energy use, energy efficiency or demand-side management programs:
- a. The two-thirds of customers using electric heating; and
 - b. The 14% of customers with usage of greater than 3,000 kWh/month in the winter months.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on October 23, 2025; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary