

**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)	
RIDERS; (3) APPROVAL OF CERTAIN)	CASE NO. 2025-00257
REGULATORY AND ACCOUNTING)	
TREATMENTS; AND (4) ALL OTHER REQUIRED)	
APPROVALS AND RELIEF)	

**RESPONSES OF JOINT INTERVENORS APPALACHIAN
CITIZENS' LAW CENTER, KENTUCKIANS FOR THE
COMMONWEALTH, KENTUCKY SOLAR ENERGY
SOCIETY, AND MOUNTAIN ASSOCIATION TO
COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION**

[DATED November 25, 2025]

Dated: December 08, 2025

**RESPONSES OF JOINT INTERVENORS APPALACHIAN CITIZENS'
LAW CENTER, KENTUCKIANS FOR THE COMMONWEALTH,
KENTUCKY SOLAR ENERGY SOCIETY, AND MOUNTAIN
ASSOCIATION TO COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION**

[DATED November 25, 2025]

Case No. 2025-00257

Question No. 1.1

Q-1.1 Refer to the Direct Testimony of Roger D. Colton (Colton Direct Testimony), page 4, lines 21–25.

- a. Provide a list of electric utilities who have prepared studies similar to which is requested of Kentucky Power within the past five years.
- b. Identify and explain the performance outcome of utilities who have prepared and adopted programs influenced by the results of the studies identified in subpart a.

A-1.1 RESPONSE:

- a. Mr. Colton has not performed a comprehensive inventory of “electric utilities who have prepared studies similar to which is requested of Kentucky Power within the past five years.” However, illustrative examples, include:
 - i. Maryland: see, “Utility Termination/Arrearage Reports,” available at <https://www.psc.state.md.us/utility-termination-arrearage-reports/>
 - ii. Pennsylvania: Residential collections data, available at <https://www.puc.pa.gov/filing-resources/reports/quinquennial-report-pursuant-per-section-1415-residential-collections-data/>
 - iii. Pennsylvania: Universal service programs and collections performance, available at: <https://www.puc.pa.gov/filing-resources/reports/universal-service-programs-and-collections-performance-reports/>
 - iv. Pennsylvania: Universal service plans and evaluations: available at: <https://www.puc.pa.gov/electricity/universal-service/>

- v. Illinois: Credit, collections and arrearages reports, available at:
<https://www.icc.illinois.gov/industry-reports/credit-collections-and-arrearages-reports/monthly-dashboard>
 - vi. Iowa: Residential past-due accounts and disconnection data, available at:
<https://iuc.iowa.gov/records-documents/data-reports/moratorium-data>
 - vii. Washington: Avista, PBR metrics reporting (affordability), available at:
<https://www.myavista.com/about-us/our-rates-and-tariffs/washington-pbr-metrics>
 - viii. Washington, Puget Sound Electric, PBR metrics reporting (affordability), available at
<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=4531&year=2022&docketNumber=220066>
- b. No study has been prepared considering the “performance outcome of utilities who have prepared and adopted programs influenced by the results of the studies identified in subpart a.”

WITNESS: Roger D. Colton

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Case No. 2025-00257

Question No. 1.2

Q-1.2 Refer to the Colton Direct Testimony, page 5, line 29. Provide the impact on the average bill for residential customers if Kentucky Power adopted the recommendation.

A-1.2 RESPONSE:

An expansion of R.E.A. Tariff from \$0.40 to \$0.75 per month would have a gross bill impact of \$0.35 per month ($\$0.75 - \$0.40 = \0.35). It would have a net bill impact of less than \$0.35 per month given the offsetting expense reductions which would result in bad debt, working capital (and associated taxes), and credit and collection expenses, as well as enhanced revenue.

WITNESS: Roger D. Colton

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Question No. 1.3

Q-1.3 Refer to the Colton Direct Testimony, page 49, lines 19–21. Explain whether Kentucky Power's daily residential peaking data was analyzed in preparation of this recommendation.

A-1.3 RESPONSE:

No. The Time of Use rate is not a new proposal offered in Mr. Colton's testimony, but is instead a proposal that has previously been found to be just and reasonable to offer to residential customers. Mr. Colton's proposal is to engage in outreach so as to use this existing rate to deliver bill reductions for the benefit of all customers without using either ratepayer funds or government funds.

WITNESS: Roger D. Colton

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Question No. 1.4

Q-1.4 Refer to the Colton Direct Testimony, page 49, line 21, and page 50, line 1. Explain how Kentucky Power may fund the recommended program. Provide a hypothetical bill impact for an average residential customer if Kentucky Power funds the program through a rider.

A-1.4 RESPONSE:

The recommended budget of \$200,00 (Direct Testimony of Roger Colton, page 49, line 21 – page 50, line 1) should be amortized over a five year period and included in base rates. Kentucky Power's EIA Form 861 for the year ending December 31, 2024 reports that Kentucky Power had residential consumption of 1,858,160 mWh. Spreading the cost over only that residential consumption results in a cost of \$0.0000215. The same EIA Form 861 reports that Kentucky Power had an average of 130,852 residential customers that year. That level of usage, along with that number of residential customers, yields an average annual usage of 14,200 kWh. The average annual impact is thus \$0.31, or a monthly bill impact of \$0.0255 per customer. If the \$200,000 budget was instead amortized over only three years, the per kWh cost would be \$0.000359; the annual bill impact would be \$0.51; and the monthly impact would be \$0.0425. The EIA Form 861 data can be accessed at <https://www.eia.gov/electricity/data/eia861/>

WITNESS: Roger D. Colton

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Question No. 1.5

Q-1.5 Refer to the Colton Direct Testimony, page 78, lines 7–15. Provide examples of utility prepayment tariffs that offer discounts to participants.

A-1.5 RESPONSE:

Mr. Colton has not performed an inventory of what utilities, if any, have “prepayment tariffs that offer discounts to participants.”

WITNESS: Roger D. Colton

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Question No. 1.6

Q-1.6 Refer to the Colton Direct Testimony, page 114, Figure 12. Provide the data used to populate the figure in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-1.6 RESPONSE:

See attached workpaper, "RDC Figure 8 and Figure 12.xlsx".

WITNESS: Roger D. Colton

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Question No. 1.7

Q-1.7 Refer to the Colton Direct Testimony, page 114, Figure 12. Provide the monthly bills that correspond with the figure.

A-1.7 RESPONSE:

See the Response to Question 6. This data can be found in the tab labelled "JI 1-29".

WITNESS: Roger D. Colton

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Question No. 1.8

Q-1.8 Refer to the Colton Direct Testimony. Explain whether the Joint Intervenors performed an analysis comparing the proposed residential rate design to a residential rate absent the two-tiered customer charge and volumetric rates that accounts for fixed cost-of-service. If so, provide the analysis and findings in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

A-1.8 RESPONSE:

The Joint Intervenors did not perform such an analysis.

WITNESS: Roger D. Colton

VERIFICATION

The undersigned, Roger D. Colton, being first duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing discovery responses and that the information contained therein is true and correct to the best of his information, knowledge, and belief, after reasonable inquiry.



Subscribed and sworn to before me by Roger D. Colton this 8th day of Dec., 2025.


Notary Public

My commission expires: 11/01/2030

