

**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 Regulatory And Accounting	)	Case No. 2025-00257
Treatments; and (4) All Other Required Approvals	)	
And Relief	)	

Kentucky Power Company’s Data Requests to the Joint Intervenors

Pursuant to the Commission’s Order dated September 11, 2025, Kentucky Power Company (“Kentucky Power” or “Company”) propounds the following data requests to be answered by the Appalachian Citizens Law Center, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association (collectively, the “Joint Intervenors”).

DEFINITIONS

- “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
- “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.
- “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.

- A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
- 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.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Attorney General's possession or subject to its control, state what disposition was made of it.
- 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.
- "Identify" used in a fashion other than as described above means to provide in detail, including all assumptions, bases, facts considered, and rationale if not called for in another part of the data request, the requested information.
- "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
- "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
- 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.
- "You" or "your" means the person whose filed testimony is the subject of these interrogatories 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 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.
- "Joint Intervenors" mean the Appalachian Citizens Law Center, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, and Mountain Association, its employees, and/or its agents, including Roger D. Colton.
- "Company" means Kentucky Power Company.
- "AEP" means American Electric Power Company, Inc.

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 interrogatories are continuing in nature, and, without regard to the date created or obtained, 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 Kentucky Power. Any studies, evaluations, analyses, 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 interrogatory 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. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Please furnish any non-disclosure or other required for disclosure of any information or response for which confidential treatment provided.

DATA REQUESTS

1. Please provide all schedules, tables, and charts included in the testimony and exhibits to the direct testimony of Roger Colton in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Colton. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please refer to page 115, lines 16-22 of the testimony of Randy Colton. Please confirm that the Renewable Energy Consumption Survey (RECS) referenced by Mr. Colton was conducted in 2020 and has not been updated since.

4. Please refer to Figures 13-17 and Table 19 of the testimony of Randy Colton.
 - (a) Please confirm that the information presented in Figures 13-17 and Table 19 reflect information for the entire Commonwealth of Kentucky.
 - (b) Please confirm that the information presented in Figures 13-17 and Table 19 does not identify specifically any income or housing data for the Company's service territory.
5. Please refer to page 116, Figure 13 of the testimony of Randy Colton.
 - (a) Identify whether the "Annual kWh Usage" term along the vertical axis of the figure reflects the average or median usage within an income range.
 - (b) Explain the methodology that determined the line of best fit (the dotted line) in Figure 13.
6. Please refer to pages 117-118, Table 19 of the testimony of Randy Colton. Confirm that each column in Table 19 identifies the percentage of the total amount of housing in each housing category that is occupied by households in different income levels. For example, the value 2.5% in the "less than \$5,000" row for the Mobile Home column means that 2.5% of the total number of mobile homes in Kentucky are occupied by households with incomes less than \$5,000.
7. Please refer to page 118-119, Figure 15 of the testimony of Randy Colton. Identify whether the "Annual kWh Usage" term along the vertical axis of the figure reflects the average or median usage within an income range.
8. Please refer to pages 121-122 of the testimony of Randy Colton.
 - (a) Please provide a copy of the referenced Census Bureau data.
 - (b) Please refer to page 121, line 11 and explain how a "substantial impact on the data" is quantified.
 - (c) Please provide the total number of owner-occupied housing units in the Company's service territory and the source of that data.
 - (d) Please provide the total number of tenant-occupied housing units in the Company's service territory and the source of that data.
9. Please refer to pages 123, lines 6-9 of the testimony of Randy Colton. Explain how, for a customer with monthly usage approaching 2,000 kWh from below, the two-tiered rate structure doesn't incentivize them to maintain their usage below 2,000 kWh.
10. Please refer to page 129, lines 14-16 of the testimony of Randy Colton. Confirm that it is your testimony that there are no other ways for customers to reduce their electricity usage except for making investments in energy efficiency.

11. Please confirm that the highlighting in Exhibit RDC-2 is for identification purposes and is not information that Joint Intervenors consider confidential information.

Respectfully submitted,



Katie M. Glass
STITES & HARBISON PLLC
400 West Market Street
Suite 1800
Louisville, Kentucky 40202-3352
Telephone: (502) 587-6391
kglass@stites.com

Kenneth J. Gish, Jr.
Harlee P. Havens
STITES & HARBISON PLLC
250 West Main Street, Suite 2300
Lexington, Kentucky 40507-1758
Telephone: (859) 226-2300
Fax: (859) 253-9144
kgish@stites.com
hhavens@stites.com

COUNSEL FOR KENTUCKY POWER
COMPANY