

**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	:	<b>Case No 2025-00257</b>
Electric Service; (2) Approval Of Tariffs And Riders; (3)	:	
Approval Of Certain Regulatory And Accounting Treatments;	:	
and (4) All Other Required Approvals And Relief	:	

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**RESPONSES OF ATTORNEY GENERAL AND KIUC TO  
KENTUCKY POWER COMPANY’S DATA REQUESTS**

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Please find the attached Responses to Data Requests filed by Kentucky Power Company  
on November 26, 2025.

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Respectfully submitted,

RUSSELL COLEMAN  
ATTORNEY GENERAL



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1. **Please provide all schedules, tables, and charts included in the testimony and exhibits to the direct testimony of Richard Baudino in electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

Attached are Mr. Baudino's responsive workpapers.

Response By: Richard Baudino

2. **Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Baudino. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

Attached are Mr. Baudino's additional workpapers. With respect to Mr. Baudino's supporting workpapers and documents, please note the following:

1. Supporting documentation in footnotes 1 – 4, 6 – 8, 18 – 21, and 26 may be accessed using the links provided in Mr. Baudino's Direct Testimony. The paper cited in footnote 17 is available at:  
<https://pages.stern.nyu.edu/~adamodar/pdfiles/papers/ERP2022Formatted.pdf>.
2. The materials cited in footnotes 12, 13, 15, 16, 24, 25, 29, and 30 are protected by copyright and may be reviewed by directly purchasing the texts.
3. The Kroll material cited in footnotes 14 and 31 and in Exhibit RAB-4, page 2 is protected by copyright and terms of use and may be obtained through a subscription to the Cost of Capital Navigator.
4. Value Line materials were not provided due to copyright restrictions and terms of use and may be obtained through a subscription to the Value Line Investment Survey.
5. Materials from S&P Capital IQ, including the data supporting Figure 4, are protected by copyright and terms of use and cannot be provided publicly by Mr. Baudino. Upon reasonable request, AG-KIUC can make this copyrighted material available for in-person inspection at a mutually agreeable day and time in its Frankfort, Kentucky office if Kentucky Power is willing to enter into a separate confidentiality agreement.
6. Source documents from the Mergent Bond Record are protected by copyright and terms of use and cannot be provided publicly by Mr. Baudino. Upon reasonable request, AG-KIUC can make this copyrighted material available for in-person inspection at a mutually agreeable day and time in its Frankfort, Kentucky office if Kentucky Power is willing to enter into a separate confidentiality agreement.

Response By: Richard Baudino

3. **Please provide all schedules, tables, and charts included in the testimony and exhibits to the direct testimony of Randy Futral in electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

All supporting workpapers associated with the Direct Testimony of Mr. Futral were filed in electronic format with Mr. Kollen's Direct Testimony.

Response By: Randy Futral

4. **Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Futral. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

Please refer to the response to Question 3.

Response By: Randy Futral

5. **Please provide all schedules, tables, and charts included in the testimony and exhibits to the direct testimony of Lane Kollen in electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

All supporting workpapers associated with the Direct Testimony of Mr. Kollen were filed in electronic format with Mr. Kollen's Direct Testimony.

Response By: Lane Kollen

6. **Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Mr. Kollen. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

Please refer to the response to Question 5.

Response By: Lane Kollen



7. **Please provide all schedules, tables, and charts included in the testimony and exhibits to the direct testimony of Leah Wellborn in electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

All supporting workpapers associated with the Direct Testimony of Ms. Wellborn were filed in electronic format with Ms. Wellborn's Direct Testimony.

Response By: Leah Wellborn

- 8. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Ms. Wellborn. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.**

**RESPONSE:**

Please refer to the response to Question 7.


Response By: Leah Wellborn

## AFFIDAVIT

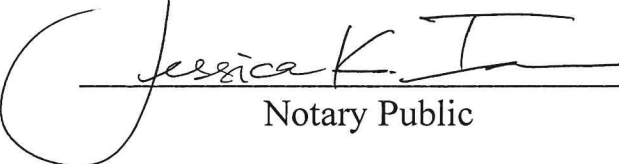
STATE OF GEORGIA            )

COUNTY OF FULTON         )

RANDY A. FUTRAL, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Randy A. Futral

Sworn to and subscribed before me on this  
8<sup>th</sup> day of December 2025.

  
\_\_\_\_\_  
Notary Public

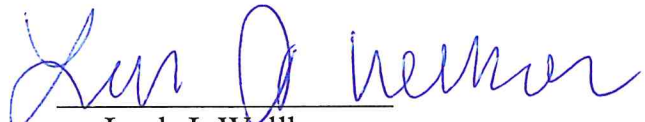
Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

## AFFIDAVIT

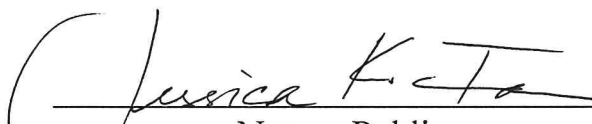
STATE OF GEORGIA            )

COUNTY OF FULTON         )

LEAH J. WELLBORN, being duly sworn, deposes and states: that the attached are her sworn responses and that the statements contained are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
Leah J. Wellborn

Sworn to and subscribed before me on this  
8th day of December 2025.

  
\_\_\_\_\_  
Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

## AFFIDAVIT

STATE OF GEORGIA            )

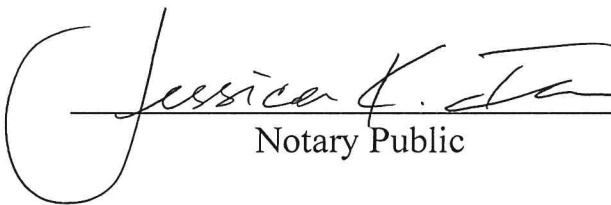
COUNTY OF FULTON         )

LANE KOLLEN, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.



Lane Kollen

Sworn to and subscribed before me on this  
8<sup>th</sup> day of December 2025.



Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027

# AFFIDAVIT

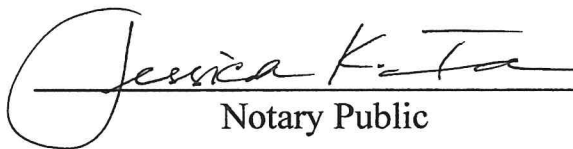
STATE OF GEORGIA )

COUNTY OF FULTON )

RICHARD A. BAUDINO, being duly sworn, deposes and states: that the attached are his sworn responses and that the statements contained are true and correct to the best of his knowledge, information and belief.

  
Richard A. Baudino

Sworn to and subscribed before me on this  
8th day of December 2025.

  
Notary Public

Jessica K Inman  
NOTARY PUBLIC  
Cherokee County, GEORGIA  
My Commission Expires 07/31/2027