

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

**KPSC
PHDR_1** Refer to the Settlement Testimony of Tanner Wolfram (Wolfram Settlement Testimony) at page S13. Explain how “levelized” was defined and how it operates in the context of the Deferred Tax Liability (DTL) credit allocation.

RESPONSE

As applied to the DTL credit allocation included in the Settlement Agreement, the term “levelized” means that the allocation of the DTL revenue credit was equalized, or allocated in a levelized way, across the classes to result in the same percentage decrease for each class. The additional DTL revenue credit for the residential class was allocated to the levelized allocation to provide additional benefit to the Residential class. Please see KPCO_R_KPSC_PHDR_1_Attachment1.

Witness: Katharine I. Walsh

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KPSC Refer to the Wolffram Settlement Testimony. Provide all supporting
PHDR_2 workpapers in Excel spreadsheet format with all formulas, rows, and
columns unprotected and fully accessible.

RESPONSE

Please see KPCO_R_KPSC_PHDR_2_Attachment1 detailing Settlement Exhibits 1, 3 and 4. Please see KPCO_R_KPSC_PHDR_2_Attachment2 detailing Settlement Exhibit 2 with calculations intact for columns reflecting the “Settlement Base Rate Increase on Total Bill.” Please see KPCO_R_KPSC_PHDR_2_Attachment3 detailing Settlement Exhibit 2 with calculations intact for columns reflecting the “Settlement Increase with DTL Rider.” Please see KPCO_R_KPSC_PHDR_2_Attachment4 detailing Witness Walsh’s Settlement Testimony Exhibits S2 and S3.

Witness: Tanner S. Wolffram

Witness: Katharine I. Walsh

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KPSC Refer to the Wolffram Settlement Testimony, Exhibit TSW-S1. Provide a
PHDR_3 list all the riders the stipulated 9.8 percent ROE would apply to if the
Stipulation Agreement were accepted.

RESPONSE

The riders for which the 9.8% ROE would apply are the Environmental Surcharge and the Decommissioning Rider.

Witness: Tanner S. Wolffram

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DATA REQUEST

KPSC Refer to the Wolfram Settlement Testimony, Exhibit TSW-S1, page 26.
PHDR_4 Provide the table shown and any supporting workpapers in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.

RESPONSE

Please see the responses and attachments provided in KPSC PHDR_1 and KPSC PHDR_2.

Witness: Katharine I. Walsh

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DATA REQUEST

**KPSC
PHDR_5**

Refer to the Wolfram Settlement Testimony, Exhibit TSW-S1, pages 9-10, Section 4.B. and Section 4.C.ii., discussing the return on the DTL Regulatory Asset and the deferral of incremental interest on short-term debt needed to fund the DTL Credits. Refer also to the Settlement Testimony of David Hodgson (Hodgson Settlement Testimony) at S7, explaining that the Deferred Tax Liability Rider Revenue Requirement includes a return on the DTL Regulatory Asset to recognize that Kentucky Power will no longer have the benefit of the interest-free loan from the federal government as the DTLs are credited to reduce rates.

a. State whether the incremental short-term interest identified on page 10 of Exhibit TSW-S1 would be limited to short-term interest on the difference between DTLs credited to customers and the DTL Regulatory Asset.

b. If the Settlement Agreement would allow for the deferral of short-term interest on amounts other than the difference between the DTL's credited to customers and the DTL Regulatory Asset, explain in detail why allowing the deferral of incremental interest on short-term debt needed to fund the DTL Credits and a return on the DTL Regulatory Asset to reflect the replacement of zero-cost capital with capital that has a carrying cost at the weighted average cost of capital would not result in customers paying carrying costs on the same capital twice.

c. Explain in detail how the amount of the DTL Regulatory Asset offsetting zero-cost capital will be calculated in the years in which the DTL Regulatory Asset is accruing. e.g. state whether the return be applied on a monthly basis as the DTL Regulatory Asset grows each month, and if so, how the accrual of the asset in each month will be determined; or whether the return will be applied to the full amount in each year or some average amount.

d. Explain in detail how the amount of the DTLs and DTL Regulatory Asset will be calculated in the years in which the DTLs and DTL Regulatory Asset are being amortized.

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RESPONSE

a. The deferral of short-term interest expense is limited to the years in which the Company would experience a cash shortfall from the settlement revenue requirement because of the DTL credits. In those years where the DTL credit is active and there is a resulting cash shortfall, the Company may need additional funds to support normal business operations. The deferral would be limited to short-term interest on the DTL Regulatory Asset balance, up to \$2 million annually. Once the DTL Regulatory Asset begins to be recovered, the deferral of short-term interest expense would not apply.

b. As discussed in the response to subpart a., the Settlement Agreement allows for deferral of short-term interest on the DTL Regulatory Asset. This deferral authority is necessary because the base rate revenue requirement reflects \$0 of interest related to short-term debt in rates, and the Company may need to incur additional short-term debt to fund normal operations as a result of the DTL Credit cash refunds provided to customers.

Further, customers are not paying a carrying cost on the same capital twice. Through the base rate revenue requirement and inclusion of net deferred tax liabilities in rate base, customers are being paid a weighted average cost of capital return on income tax expense recorded in previous years but not yet payable to the IRS (i.e., the Company's interest free loan from the IRS). As deferred tax liabilities decrease and rate base increases because customers are receiving a cost of service benefit (i.e., reduction of income tax expense) and related cash refund until amounts are due to IRS (i.e., DTL Credits), the return component of the revenue requirement calculation increases. Customers are consistently paid a return on net deferred tax liabilities included in rate base.

c. A debit will be recorded monthly to accrue the amount of income tax expense that is being deferred to the DTL Regulatory Asset to credit customers. In addition, on a monthly basis, interest will be accrued on the balance of DTL Regulatory Asset.

d. The DTLs included as a reduction to base rates will remain the same during the period that these base rates are in effect and will only change with the implementation of new base rates to align with the amount of taxes that have been deferred and due to the IRS at a later date. The DTL Regulatory Asset will be reduced on a monthly basis by the amount of the amortization and interest recovered through the DTL Rider.

Witness: Tanner S. Wolfram (subpart a)

Witness: David A. Hodgson (subparts b-d)

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DATA REQUEST

**KPSC
PHDR_6** Refer to January 15, 2026 Hearing Testimony of Franz Messner (Messner Hearing Testimony), Hearing Video Transcript (H.V.T.) at 11:43:50, discussing the metrics that the credit rating agencies consider and the weight that they place on each. Provide documentation from Moody's, S&P, and Fitch identifying the metrics that they use for credit ratings and the weight that they place on those metrics.

RESPONSE

Please refer to KPCO_R_KPSC_PHDR_6_ConfidentialAttachment1 through KPCO_R_KPSC_PHDR_6_ConfidentialAttachment3.

Witness: Franz D. Messner

KPCO_R_KPSC_PHDR_6_ConfidentialAttachment1 is redacted in its entirety.

KPCO_R_KPSC_PHDR_6_ConfidentialAttachment2 is redacted in its entirety.

KPCO_R_KPSC_PHDR_6_ConfidentialAttachment3 is redacted in its entirety.

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DATA REQUEST

KPSC Refer to January 15, 2026 Messner Hearing Testimony, H.V.T. at
PHDR_7 11:44:28, discussing Kentucky Power's credit ratings over the last two decades.

a. Provide Kentucky Power's most recent credit ratings and outlook as of January 1, 2006, from Moody's, S&P, and Fitch, and identify changes in Kentucky Power's credit ratings and outlook from Moody's, S&P, and Fitch since that time, including when those changes occurred.

b. For any long-term debt Kentucky Power has issued since January 1, 2006, identify the principal balance of the debt, the interest rate on the debt, the Date of Offering, the Date of Maturity, the weighted average life of the debt at issuance, and the spread between the interest rate on the debt and U.S. Treasuries with the same maturities based on the I-curve.

RESPONSE

a. Please refer to KPCO_R_KPSC_PHDR_7_Attachment1.

b. Please see the below table for the requested information.

Date of Issuance	Maturity	Principal Balance	Coupon	Spread	Weighted Avg. Life
<u>Senior Notes</u>					
9/11/2007	9/15/2017	\$ 325,000,000	6.069%	T+160	10.0
6/18/2009	6/18/2021	\$ 40,000,000	7.250%	T+360	12.0
6/18/2009	6/18/2029	\$ 30,000,000	8.030%	T+350	20.0
6/18/2009	6/18/2039	\$ 60,000,000	8.130%	T+360	30.0
9/30/2014	9/30/2026	\$ 120,000,000	4.18%	T+160	12.0
12/31/2014	12/31/2026	\$ 80,000,000	4.33%	T+175	12.0
11/3/2015	11/3/2016	\$ 50,000,000	Floating	NA	1.0
9/12/2017	9/12/2024	\$ 65,000,000	3.13%	T+115	7.0
9/12/2017	9/12/2027	\$ 40,000,000	3.35%	T+120	10.0
9/12/2017	9/12/2029	\$ 165,000,000	3.45%	T+130	12.0
9/12/2017	9/12/2047	\$ 55,000,000	4.12%	T+140	30.0
11/10/2023	11/15/2033	\$ 375,000,000	7.00%	T+250	10.0

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<u>Pollution Control Bond</u>							
6/26/2014	6/26/2017	\$	65,000,000	Floating	NA	3.0	1
6/26/2017	6/19/2020	\$	65,000,000	2.00%	NA	3.0	1
6/19/2020	6/13/2023	\$	65,000,000	2.35%	NA	3.0	1
6/13/2023	6/17/2026	\$	65,000,000	4.70%	NA	3.0	1

<u>Term Loans</u>							
11/5/2014	11/5/2018	\$	75,000,000	Floating	+150	4.0	
10/26/2018	10/26/2022	\$	75,000,000	Floating	+150	4.0	
3/6/2020	3/6/2022	\$	125,000,000	Floating	L+65	2.0	
6/17/2021	6/17/2023	\$	150,000,000	Floating	L+80	2.0	
3/2/2022	9/6/2022	\$	125,000,000	Floating	S+70	0.5	
9/6/2022	12/31/2023	\$	125,000,000	Floating	S+105	1.3	
7/22/2022	12/31/2023	\$	150,000,000	Floating	S+70	1.4	
5/6/2023	6/30/2024	\$	150,000,000	Floating	S+105	1.2	
6/26/2024	6/25/2025	\$	150,000,000	Floating	S+105	1.0	

These bonds have a mandatory put date for remarketing. The WAL reflects the

1. reissuance date.

L=Libor

S=SOFR

Witness: Franz D. Messner

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DATA REQUEST

**KPSC
PHDR_8**

Refer to January 15, 2026 Messner Hearing Testimony, H.V.T. at 11:49:41, discussing steps to investigate whether debt is sold at a premium or discount shortly or immediately after an initial public offering. Refer also to Application, Section V, Workpaper S-3, pg.1 reflecting certain recent long-term debt offerings.

a. For each initial offering of long-term debt in Workpaper S-3, explain the extent to which the debt was trading at a premium or a discount within the first seven days or so following the issuance and provide any information or documentation provided by underwriters following the initial offering indicating whether the debt was trading at a discount or premium.

b. For each initial offering of long-term debt in Workpaper S-3, identify the subscription rate for the debt at the time issuance.

RESPONSE

a. Please see KPCO_R_KPSC_PHDR_8_Attachment6 for trading information related to line 9 of Application, Section V, Workpaper S-3, pg.1. In the days following pricing, the 2033 Notes traded at a premium and in a range of \$100 - \$102 as trades took place at slightly tighter spreads than the spread at issue (T+250). Please see KPCO_R_KPSC_PHDR_8_Attachment7 for trading information related to line 12 of Application, Section V, Workpaper S-3, pg.1. The \$65M PCRBs did not trade in the secondary market in the first 7 days of trading (from 6/2/23 – 6/9/23) – all bonds were priced in the primary market at par. The vast majority of Kentucky Power long-term debt are private placements.

b. Please refer to KPCO_R_KPSC_PHDR_8_ConfidentialAttachment1 through KPCO_R_KPSC_PHDR_8_ConfidentialAttachment5 for all available information for all issuances included in Workpaper S-3.

Witness: Franz D. Messner

KPCO_R_KPSC_PHDR_8_ConfidentialAttachment1 is redacted in its entirety.

KPCO_R_KPSC_PHDR_8_ConfidentialAttachment2 is redacted in its entirety.

KPCO_R_KPSC_PHDR_8_ConfidentialAttachment3 is redacted in its entirety.

KPCO_R_KPSC_PHDR_8_ConfidentialAttachment4 is redacted in its entirety.

KPCO_R_KPSC_PHDR_8_ConfidentialAttachment5 is redacted in its entirety.

AEP 7 11/15/33 Corp

Export

Settings ▾

Trade History

CUSIP 491386AP

Buy

Sell

Source TRAC ▾

View

Price ▾

Range 11/08/23 - 11/15/23

Size >=1MM ▾

Charts

☒ Reported Vol
 ☐ Estimated Vol
 ☐ Show Net
 ☐ Show High/Low

	Price			Dealer to Clt. Vol(M)			Dealer to Aff. Vol(M)			D->D
Date	Last	Vol(M)	Trds	Buys	Sells	Net	Buys	Sells	Net	Vol(M)
Total	101.553	90,900	77	48,900	22,000		0	0		20,000
11/15/23	101.553	6,675	4	1,675	0		0	0		5,000
11/14/23	102.145	14,000	7	9,000	0		0	0		5,000
11/13/23	100.614	6,225	2	6,225	0		0	0		0
11/09/23	100.629	38,000	38	13,000	18,000		0	0		7,000
11/08/23	100.000	26,000	26	19,000	4,000		0	0		3,000



Kentucky Power Company

Trading Levels

KeyBanc Capital Markets Inc. – Corporate & Investment Banking
Tax-Exempt Energy Group

January 26, 2026

Disclosures and General Information Exclusion

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Interest rates used herein are hypothetical and take into consideration conditions in today's market and other factual information such as the issuer's credit rating, geographic location and market sector. Interest rates applied herein are hypothetical, based on current market facts and should not be viewed as rates that KBCM expects to achieve for you should we be selected to act as your underwriter or placement agent. Information about interest rates and terms for SLGs is based on current publically available information and treasury or agency rates for open-market escrows are based on current market interest rates for these types of credits and should not be seen as costs or rates that KBCM expects to achieve for you should we be selected to act as your underwriter or placement agent.



Kentucky Power Company – Trading Levels

WVSDEV 4.7 04/01/36	99.485	1.51	99.485 / 99.485	6.024 / 6.024				
	As of 23 Jan	Vol 50M		Source MSRB				
95648VBP Muni	99) Disclaimer			90) Export		97) Settings		
Issuer	WEST VIRGINIA ST ECON DEV AUTH				CUSIP 95648VBP3			
Series	VAR-AMT-REF-KY PWR CO-MITCHELL				Coupon 4.700	Maturity 04/01/36	Issued 06/26/14	State WV
					Range: 06/02/23	-	06/09/23	Trade Size All Sizes
1) Bond		2) Series		3) Issuer				
View	Price	Spread:		<input type="radio"/> Convention <input type="radio"/> YTW <input type="radio"/> YTM				
Trade Aggregate								
	Days	Volume (M)*	Trds	High	Low	Avg	Dealer to Client Volume(M)	D-D
							Dlr Buy Dlr Sell Net	Vol(M)
	1	65,000	10	100.000	100.000	100.000	0 65,000 -65,000	
98) Charts								
	Date	Vol(M)*	Trds	High	Low	Avg	Dealer to Client Volume(M)	D-D
							Dlr Buy Dlr Sell Net	Vol(M)
101)	06/02/23	65,000	10	100.000	100.000	100.000	0 65,000 -65,000	



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DATA REQUEST

**KPSC
PHDR_9**

Refer to January 15, 2026 Messner Hearing Testimony, H.V.T. at 11:55:30, in which Kentucky Power's witness discussed how the interest rate for Kentucky Power's short-term debt is determined but indicated a more thorough answer could be provided through a post hearing request. Refer also to Application, Section V, Workpaper S-3, page 2, reflecting Kentucky Power's short-term debt in each month from June 2024 through May 2025.

- a. Explain in detail how Kentucky Power's short-term interest is determined.
- b. Provide any written policy or procedure discussing how the interest rate on short-term debt is determined.
- c. Provide the "Notes Payable Outstanding at the End of Month" as that term is used in Workpaper S-3 for each month from January 2019 through May 2024 and June 2025 through December 2025.

RESPONSE

- a & b. Please refer to KPCO_R_KPSC_PHDR_9_Attachment1.
- c. Please refer to KPCO_R_KPSC_PHDR_9_Attachment2.

Witness: Franz D. Messner

AEP SYSTEM AMENDED AND RESTATED UTILITY MONEY POOL AGREEMENT

This AMENDED AND RESTATED UTILITY MONEY POOL AGREEMENT ("Agreement") is made and entered into this 9th day of December, 2004 by and among American Electric Power Company, Inc., a New York corporation ("AEP"), AEP Utilities Inc., a Delaware corporation ("AEP Utilities"), both registered holding companies under the Public Utility Holding Company Act of 1935, as amended (the "Act"), American Electric Power Service Corporation ("AEPSC"), a New York corporation and a nonutility subsidiary of AEP (in its role as administrative agent and as a participant in the Utility Money Pool), AEP Utility Funding LLC, a Delaware limited liability company ("AEPUF"), and certain of the direct or indirect subsidiaries of AEP, each of which are signatories hereto and participants in the AEP Utility Money Pool ("Participants"), or which subsequently become signatories hereto and agree to abide by the terms herein. (All of the above are referred to as a Party or Parties to this Agreement).

WHEREAS, the following entities are each a direct or indirect subsidiary of AEP, and a Participant in the AEP Utility Money Pool (collectively referred to herein as "Operating Companies"):

AEP Generating Company
AEP Texas Central Company
AEP Texas North Company
Appalachian Power Company
Columbus Southern Power Company
Indiana Michigan Power Company
Kentucky Power Company
Kingsport Power Company
Ohio Power Company
Public Service Company Of Oklahoma
Southwestern Electric Power Company
Wheeling Power Company

And

WHEREAS, in addition to the Operating Companies, the following are Participants in the AEP Utility Money Pool:

American Electric Power Service Corporation
Blackhawk Coal Company
Cedar Coal Company
Central Appalachian Coal Company
Central Coal Company
Colomet, Inc.
Conesville Coal Preparation Company
Dolet Hills Lignite Company, LLC

Franklin Real Estate Company
Indiana Franklin Reality, Inc.
Simco, Inc.
Southern Appalachian Coal Company

WHEREAS, the Participants from time to time have need to borrow funds on a short-term basis; and

WHEREAS, some of the Parties from time to time are expected to have funds available to loan on a short-term basis; and

WHEREAS, AEP and the Parties have established a pool (the "Utility Money Pool") to coordinate and provide for certain of the Participants' short-term cash requirements;

WHEREAS, AEPUF has been formed to fund the Utility Money Pool; and

NOW THEREFORE, in consideration of the premises, and the mutual promises set forth herein, the Parties hereto agree as follows:

ARTICLE I CONTRIBUTIONS AND BORROWINGS

Section 1.1. Contributions to the Utility Money Pool.

American Electric Power Service Corporation ("AEPSC") shall act as administrative agent of the Utility Money Pool. Each Participant, AEP, AEP Utilities, and AEPUF will determine on a daily basis, the amount of funds it has available for contribution to the Utility Money Pool. The determination of whether a Party at any time has surplus funds, or shall lend such funds to the Utility Money Pool, will be made by such Party's treasurer, any assistant treasurer, or by a designee thereof, on the basis of cash flow projections and other relevant factors, in such Party's sole discretion. Each Party may withdraw any of its funds at any time upon notice to AEPSC.

Section 1.2 Rights to Borrow.

(a) Subject to the provisions of Section 1.4(b) of this Agreement, all short-term borrowing needs of the Participants may be met by funds in the Utility Money Pool to the extent such funds are available. Each Participant shall have the right to borrow from the Utility Money Pool from time to time, subject to the availability of funds and the limitations and conditions set forth herein and in the applicable orders of the Securities and Exchange Commission ("SEC") and other regulatory authorities. Each Participant may request loans from the Utility Money Pool from time to time during the period from the date hereof until this Agreement is terminated by written agreement of the Parties; provided, however, that the aggregate amount of all loans requested by any Participant hereunder shall not exceed the applicable borrowing limits set forth in applicable orders of the SEC and other regulatory authorities, resolutions of such Board of

Directors, such Party's governing corporate documents, and agreements binding upon such Party. No Participant shall be obligated to borrow from the Utility Money Pool if lower cost funds can be obtained from its own external borrowing.

(b) Neither AEP, AEP Utilities nor AEPUF will borrow funds from the Utility Money Pool or any Participant. Participants in the Utility Money Pool will not engage in lending and borrowing transactions with participants in the Nonutility Money Pool. The Utility Money Pool will not borrow from the Nonutility Money Pool.

Section 1.3 Source of Funds.

- (a) AEPSC administers the Utility Money Pool by matching up, to the extent possible, short-term cash surpluses and loan requirements of the various Participants. Participants' requests for short-term loans are met first from surplus funds of other Participants which are available to the Utility Money Pool. To the extent the Participant contributions of surplus funds to the Utility Money Pool are insufficient to meet Participant requests for short-term loans, AEP or AEP Utilities may contribute corporate funds to the extent available or borrowings may be made from external sources. Funds will be made available from such sources in such other order as AEPSC, as administrator of the Utility Money Pool, may determine will result in a lower cost of borrowing to companies borrowing from the Utility Money Pool, consistent with the individual borrowing needs and financial standing of the Parties providing funds to the Utility Money Pool.
- (b) External borrowings may be made by AEP, AEP Utilities, Inc., or AEPUF, each individually, a Lending Party, collectively Lending Parties, from the sale of commercial paper notes and/or other instruments authorized by the SEC, and/or bank borrowings ("External Funds"), the proceeds of which would be added to the Utility Money Pool, in each case to the extent permitted by applicable laws and regulatory orders. All debt issued in connection with the Utility Money Pool will be unsecured. External borrowings by AEP, AEP Utilities, or AEPUF will not be made unless there are no surplus funds in the treasuries of the Participants sufficient to meet borrowing needs. If it is determined that AEP can borrow money at a cheaper rate than AEPUF can, then AEP will fund the Utility Money Pool directly.
- (c) Each borrowing Participant will borrow pro rata from each fund source in the same proportion that the amount of funds provided from that fund source bears to the total amount of short-term funds available to the Utility Money Pool. On any day, when more than one fund source (e.g., surplus treasury funds of AEP, AEP Utilities or other Utility Money Pool participants ("Internal Funds") and External Funds), with different rates of interest, is used to fund loans through the Utility Money Pool, each borrowing party will borrow pro rata from each fund source in the same proportion that the amount of funds provided by that fund source bears to the total amount of short-term funds available to the Utility Money Pool.

Section 1.4 Authorization.

(a) The determination of whether a Participant or a Lending Party has at any time surplus funds to lend to the Utility Money Pool will be made by its treasurer, any assistant treasurer, or by a designee thereof.

(b) Any loan from the Utility Money Pool to a Participant shall be authorized by the borrowing Participant's treasurer, any assistant treasurer, or by a designee thereof. No Party shall be required to effect a borrowing through the Utility Money Pool if such Participant determines that it can (and is authorized to) effect such borrowing at lower cost through the sale of its own commercial paper or other instruments, or borrowing directly from banks.

Section 1.5 Investment of Investment Pool Funds.

Funds which are loaned from Participants into the Utility Money Pool which are not required to satisfy borrowing needs of other Participants ("Investment Pool") will be invested on the behalf of the Lending Parties in one or more short-term instruments ("External Investments"), including (i) interest-bearing accounts with banks; (ii) obligations issued or guaranteed by the U.S. government and/or its agencies and instrumentalities, including obligations under repurchase agreements; (iii) obligations issued or guaranteed by any state or political subdivision thereof, provided that such obligations are rated not less than "A" by a nationally recognized rating agency; (iv) commercial paper rated not less than "A-1" or "P-1" or their equivalent by a nationally recognized rating agency; (v) money market funds; (vi) bank certificates of deposit, (vii) Eurodollar funds; (viii) short-term debt securities rated AA or above by Standard & Poor's, Aa or above by Moody's Investors Service, or AA or above by Fitch Ratings; (ix) short-term debt securities issued or guaranteed by an entity rated AA or above by Standard & Poor's, Aa or above by Moody's Investors Service, or AA or above by Fitch Ratings; and (x) such other investments as are permitted by Section 9(c) of the Act and Rule 40 thereunder.

No funds from the Utility Money Pool will be invested in EWG's or FUCO's.

Section 1.6 Utility Money Pool Interest.

The interest rate applicable on any day to then outstanding loans through the Utility Money Pool, whether or not evidenced by a promissory demand note, will be the composite weighted average daily effective cost incurred by the Lending Parties for External Funds outstanding on that date. If there are no External Funds outstanding on that date, then the rate would be the certificate of deposit yield equivalent of the 30-day Federal Reserve "A2/P2" Non-Financial Commercial Paper Composite Rate (the "Composite"), or if no Composite is established for that day, then the applicable rate will be the Composite for the next preceding day for which a composite is established.

If the Composite shall cease to exist, then the rate would be the composite which then most closely resembles the Composite and/or most closely mirrors the pricing the Lending Parties would expect if it had External Funds.

Section 1.7 Investment Pool Interest.

Interest income related to External Investments will be calculated daily and allocated back to Participants on the basis of their relative contribution to the Investment Pool funds on that date.

Section 1.8 Repayment.

Each Participant receiving a loan hereunder shall repay the principal amount of such loan, together with all interest accrued thereon, on demand and in any event not later than the expiration date of SEC authorization for the operation of the Utility Money Pool. All loans made through the Utility Money Pool may be prepaid by the borrower without premium or penalty.

Section 1.9 Form of Loans to Participants.

Loans to the Participants through the Utility Money Pool will be made pursuant to open-account advances, although any AEPSC or Participant would at all times be entitled to receive upon request a promissory note evidencing the transaction. Any such note shall: (a) be substantially in the form attached herewith as Exhibit A; (b) be dated as of the date of the initial borrowing; (c) mature on demand or on a date mutually agreed to by the Parties to the transaction, but in any event not later than the expiration date of the SEC authorization for the operation of the Utility Money Pool; and (d) be repayable in whole at any time or in part from time to time, without premium or penalty.

ARTICLE II OPERATION OF THE UTILITY MONEY POOL

Section 2.1 Operation.

Operation of the Utility Money Pool, including record keeping and coordination of loans, will be handled by AEPSC under the authority of the treasurer or any assistant treasurer of AEP and/or AEPSC. AEPSC shall be responsible for the determination of all applicable interest rates and charges to be applied to any loans from the Utility Money Pool and earnings to be applied to any loans to the Utility Money Pool and/or Investment Pool outstanding at any time hereunder, shall maintain records of all advances, interest charges and accruals and interest and principal payments for purposes hereof, and shall prepare periodic reports thereof for the Parties. Services rendered by AEPSC will be "at cost" in accordance with rules of the SEC.

Section 2.2 Certain Costs.

The cost of fees and/or compensating balances paid to banks to maintain credit lines will be allocated to the Participants on the basis of relative maximum non-coincidental borrowings of the Participants.

Section 2.3 Event of Default.

If any Participant shall generally not pay its debts as such debts become due, or shall admit in writing its inability to pay its debts generally, or shall make a general assignment for the benefit of creditors, or any proceeding shall be instituted by or against any Participant seeking to adjudicate it a bankrupt or insolvent, then AEPSC, on behalf of the Utility Money Pool, may, by notice to the Participant, terminate the Utility Money Pool's commitment to the Participant and/or declare the unpaid principal amount of any loans to such Participant, and all interest thereon, to be forthwith due and payable and all such amounts shall forthwith become due and payable without presentment, demand, protest or other formalities of any kind, all of which are hereby expressly waived by the Participant.

ARTICLE III AEP UTILITIES FUNDING LLC

Section 3.1 AEPUF.

AEPUF is a special purpose financing conduit, formed to fund the Utility Money Pool. AEPUF may obtain funds from external sources or from AEP or AEP Utilities. AEP, AEP Utilities and the Operating Companies are also authorized to fund the Utility Money Pool through the issuance of short-term debt. AEPUF will have a separate bank account for all Utility Money Pool funds. AEPUF may issue commercial paper or other short-term debt for the benefit of the Utility Money Pool participants and will lend cash proceeds of the issuance of commercial paper to each Participant as said Participant's needs are identified. When AEPUF directly issues commercial paper to dealers to fund the Utility Money Pool, each Operating Company that borrows from AEPUF must maintain comparable debt ratings equal to or greater than AEPUF and maintain requisite backup facilities with one or more financial institutions.

Section 3.2 Loans.

AEPUF shall provide the cash proceeds of each issuance of commercial paper or other short-term debt to the Utility Money Pool. The proceeds of borrowings by AEPUF will not be loaned to AEP or AEP Utilities. The proceeds of the borrowings of AEPUF will be used to repay AEPUF's borrowings or be invested to continue funding the Utility Money Pool.

Section 3.3 Several Liability.

It is expressly agreed that the obligations of each Participant to AEPUF are several and not joint and, subject to paragraph 3.4 below, that each Participant shall not be responsible to AEPUF or any assignee or creditor of AEPUF for any payment in excess of payments due under any Participant's outstanding note and its pro rata share of other expenses and administrative costs of AEPUF in connection with its funding of the Utility Money Pool. No Participant will be liable for the borrowings of any other affiliate under the Utility Money Pool.

Section 3.4 Placement Agents.

(a) As a condition precedent to each commercial paper dealer and placement agent (each, a "Placement Agent") entering into a dealer or placement agreement with AEPUF (each such agreement, a "Placement Agreement"), each Participant agrees: (i) to pay all costs, expenses, liabilities, losses and damages, including liabilities in respect of the AEPUF's indemnification obligations under the Placement Agreements (collectively, the "Liabilities") which it may incur relating to the offer and sale of AEPUF's commercial paper, the proceeds of which were used to make any loan to such Participant under this agreement, and (ii) to pay its Pro Rata Share of all other Liabilities which AEPUF may incur other than any such Liability which relates to the offer and sale of AEPUF's commercial paper the proceeds of which were used to make any loan to any other participant in the Utility Money Pool in respect of which such other affiliate is obligated to pay the full amount of such Liability. As used herein the term "Pro Rata Share" of any Liability shall mean an amount equal to the product of such Liability and a fraction expressed as a percentage (x) the numerator of which is the average outstanding loans made to the Participant during the period from the date which is three years prior to the date such Liability is due and payable to the date such Liability is due and payable (the "Determination Period"), and (y) the denominator of which is the average aggregate outstanding loans made during the Determination Period to the Participant and all other Participants which received loans from AEPUF and which are obligated to pay such Liability in accordance with this provision.

(b) Each Participant and AEPUF hereby acknowledge and agree that each Placement Agent is a third-party beneficiary of this Article III and is entitled to the benefits of the obligations of each separate Participant contained in this Article III and is entitled to bring any action to enforce such obligations directly against the separate Participant. In the case of any specific Liability arising out of or in connection with the Placement Agreement, each Participant shall pay the amount of such Participant's Liability directly to such Placement Agent or as the Placement Agent directs.

(c) This Article III shall not be amended or modified without the prior written consent of each Placement Agent. The agreements and obligations of each of the Participants set forth in this Article III shall survive the termination of this Agreement.

ARTICLE IV MISCELLANEOUS

Section 4.1 Amendments.

No amendment to this Agreement shall be effective unless the same be in writing and signed by all Parties thereto.

Section 4.2 Legal Responsibility.

Nothing herein contained shall render AEP or any Party liable for the obligations of any other Party(ies) hereunder and the rights, obligations and liabilities of AEP and the Parties are several in accordance with their respective obligations, and not joint.

Section 4.3 Governing Law.

This Agreement shall be governed by, and construed in accordance with, the laws of the State of New York.

IN WITNESS WHEREOF, the undersigned Parties have duly caused this document to be signed on their behalf on the date first written above by the undersigned thereunto duly authorized.

AMERICAN ELECTRIC POWER COMPANY, INC.

and

AEP UTILITIES, INC.

AEP UTILITY FUNDING LLC

**AMERICAN ELECTRIC POWER SERVICE CORPORATION, as
Agent and Participant**

Participants:

**AEP GENERATING COMPANY
AEP TEXAS CENTRAL COMPANY
AEP TEXAS NORTH COMPANY
APPALACHIAN POWER COMPANY
COLUMBUS SOUTHERN POWER COMPANY
INDIANA MICHIGAN POWER COMPANY
KENTUCKY POWER COMPANY
KINGSPORT POWER COMPANY
OHIO POWER COMPANY
PUBLIC SERVICE COMPANY OF OKLAHOMA
SOUTHWESTERN ELECTRIC POWER COMPANY
WHEELING POWER COMPANY**

**BLACKHAWK COAL COMPANY
CEDAR COAL COMPANY
CENTRAL APPALACHIAN COAL COMPANY
CENTRAL COAL COMPANY
COLOMET, INC.
CONESVILLE COAL PREPARATION COMPANY
DOLET HILLS LIGNITE COMPANY, LLC
FRANKLIN REAL ESTATE COMPANY
INDIANA FRANKLIN REALTY, INC.
SIMCO, INC.
SOUTHERN APPALACHIAN COAL COMPANY**

By: Wendy D. Hargis
Assistant Treasurer of each
of the above-listed companies.

EXHIBIT A

**FORM OF UTILITY MONEY POOL NOTE
TO BE EXECUTED BY BORROWING PARTIES
TO AEP OR OTHER PARTIES**

_____, 20__

FOR VALUE RECEIVED, the undersigned, _____ (the "Borrower"), hereby promises to pay to the order of _____ (the "Lender") at its principal office in _____, on demand or on _____, 20__, or at the option of the Borrower, whichever first occurs, but in any event not later than the expiration date of the SEC authorization for the operation of the Utility Money Pool, the principal sum set forth on the attachment hereto as "Principal Amount Outstanding." This note may be paid in full at any time or in part from time to time without premium or penalty. The Principal Amount Outstanding shall bear interest at the composite weighted average daily effective cost incurred by the Lending Parties for External Funds outstanding on that date. If there are no External Funds outstanding on that date, then the rate would be the CD yield equivalent of the 30-day Federal Reserve "A2/P2" Non-Financial Commercial Paper Composite Rate (the "Composite"), or if no Composite is established for that day, then the applicable rate will be the Composite for the next preceding day for which a Composite is established.

This Note shall be governed by, and construed and interpreted in accordance with, the Laws of the State of New York.

IN WITNESS WHEREOF, the undersigned, pursuant to due authorization, has caused this Note to be executed in its name and on its behalf by its duly authorized officer.

(Name of Borrower)

By: _____
Name: _____
Title: _____

[illegible]

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Provide the number of disconnections and subsequent reconnections per
PHDR_10 month for the test year separated by rate class.

RESPONSE

Please see KPCO_R_KPSC_PHDR_10_Attachment1.

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Refer to Direct Testimony of Tanner S. Wolffram, pages 32-36. Provide
PHDR_11 net present value of storm expenses to be deferred.

RESPONSE

The Company cannot provide a net present value of storm expenses it would defer if the deferral proposal included in the Company's initial case, and as modified in the Settlement Agreement, as it would depend on the storm activity the Company incurs after the final order in this case. Please see KPCO_R_KPSC_PHDR_11_Attachment1 for the total storm deferrals on the Company's books as of December 2025.

Witness: Tanner S. Wolffram

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

- KPSC
PHDR_12** Refer to Kentucky Power's response to Commission Staff's Fourth Request for Information (Staff's Fourth Request), Item 5(c) and (d).
- a. For the month preceding the test year and for each month in the test year, provide a breakdown of all net plant balance as of the end of each month associated with the trees outside of right-of-way (TOR) program, including the plant in service and accumulated depreciation as of the end of each month.
 - b. Explain how the cost of the TOR program is expensed for federal tax purposes.
 - c. Provide the test year amount spent on the TOR program.

RESPONSE

- a. Please see KPCO_R_KPSC_PHDR_12_Attachment1 for a breakdown of net plant balances and corresponding depreciation for the TOR program.
- b. TOR activities are performed as capital work. Consequently, those activities are capitalized and depreciated for federal tax purposes.
- c. The Company spent \$7.203 million in capital TOR during the test year period, 12 months ended May 2025.

Witness: Michele Ross

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026
Page 1 of 2

DATA REQUEST

**KPSC
PHDR_13** Refer to Kentucky Power's response to Staff's Fourth, Item 5(e) in which Kentucky Power identifies FERC regulations it contends justify capitalizing the annual cost of the TOR program. Refer also to FERC's decision in Pacific Gas and Electric Company, 189 FERC P 61021, 2024 WL 4778014, (Oct. 8, 2024), attached as an Appendix.

- a. Explain why the cost of the TOR program should be capitalized in light of FERC's decision in that case.
- b. Identify orders, if any, of the Kentucky Commission in which the capitalization of the cost of Kentucky Power's TOR program was raised and specifically addressed by the Commission.

RESPONSE

a. The capital treatment is consistent with the information provided in Staff 4_5. The Company cannot provide specifics on FERC's decision regarding Pacific Gas and Electric Company's proposed treatment beyond the language included in the referenced decision. The Commission has the discretion to approve capital ratemaking treatment for the TOR program regardless of the referenced FERC decision, given (1) the longer-term benefits of the TOR program to customers and (2) the corresponding mitigated rate impacts associated with capital treatment of the TOR program because cost recovery occurs over many years, as compared to treating program cost as expense and recovering an ongoing level of expense each year. For example, using the Company's proposed TOR proforma adjustment in its initial filing, the Company sought to increase plant in service included in rate base by \$18 million for TOR program costs, which resulted in a roughly \$2.1 million annual revenue requirement increase. If those same costs were expensed, it would have resulted in an \$18 million annual revenue requirement increase.

Furthermore, these investments to initially clear those trees outside the right-of-way provide longer term, meaningful benefits to customers as explained in the Direct Testimony of Company Witness Ross. Specifically, referencing Figure MR-8, there was an approximately 20% decrease in CMI for the circuits that were cleared as part of the TOR program. Additionally, Company Witness Spanos, as part of his depreciation study, generally applied a 50-year useful life to these plant balances for purposes of depreciation, which further support the longer-term nature of these investments. As such, the Company continues to support capital ratemaking treatment for these investments.

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026
Page 2 of 2

b. The Company initially included the TOR pilot program in its 2018 Vegetation Management Report and has included those costs of that program, including the capital treatment of those amounts, in its subsequent base rate cases, starting with Case No. 2020-00174. Furthermore, the Commission has previously recognized the importance of the TOR program and acknowledged the capital treatment of TOR program in Case No. 2023-00159,

The Commission notes that the DRR Work Plan included the additional Vegetation Management TOR Pilot program that is showing success in reducing customer outages. The Commission encourages Kentucky Power to continue the TOR Pilot program. In addition, the Commission expects that once sections of circuit ROW have been widened, those widened sections will be incorporated into the ongoing Vegetation Management program as those circuits are cleared in future cycle years.

The language in this section of the Order specifically recognized the capital nature of the initial clearing for TOR then TIR treatment of any future clearing of those rights-of-way that were initially cleared as part of the TOR program.

Witness: Tanner S. Wolffram

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Refer to Direct Testimony of John J. Spanos, pages 10-13. Provide net
PHDR_14 present value of decommissioning cost-related assets.

RESPONSE

The amounts for decommissioning of steam facilities are costs to be incurred not assets. The net salvage discussion on pages 10-13 of the Direct Testimony of John J. Spanos discusses the allocation of these costs over the life of the related assets that will be retired. The amount of these decommissioning costs were \$7,573,326 for Big Sandy and \$65,387,000 for Mitchell as of the date of the filing. However, it should be noted that these decommissioning costs were removed as part of the settlement.

Witness: John Spanos

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

**KPSC
PHDR_15** Refer to the Application, Exhibit E. Provide an updated version of Exhibit E reflecting any approved revisions made outside of this case that are still in effect, any proposed revisions made as a result of discovery in this case, and any proposed revisions made as part of the Settlement Agreement such that they are distinguishable from the revisions included in the original Exhibit E to the application.

RESPONSE

The Company is diligently working on completing this request and has filed a Motion for Extension of Time to file its response by no later than January 30, 2026.

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Provide a clean version of the entire tariff as currently proposed by the
PHDR_16 Settlement Agreement.

RESPONSE

The Company is diligently working on completing this request and has filed a Motion for Extension of Time to file its response by no later than January 30, 2026.

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

**KPSC
PHDR_17** Refer to the Settlement Testimony of Tanner Wolffram, Exhibit TSW-S1, page 7, Section 2(D)(vi). Consider a hypothetical where interim retirements and interim net salvage are removed from the revenue requirement in the instant case, and the proposed securitization legislation does not pass, bringing those costs back into the revenue requirement in Kentucky Power's next general rates case.

- a. Explain the impact that inclusion would have on the revenue requirement and, more specifically, the residential class in Kentucky Power's next general rates case.
- b. Provide any carrying costs that would be included in the calculation.

RESPONSE

a. Holding all else equal, the inclusion of interim retirements and interim net salvage would result in an increase in any future revenue requirement as demonstrated in Exhibit TSW-S1 to Company Witness Wolffram's Settlement Testimony on page 21 of 32. Removal of those amounts reduced the Company's as-filed revenue requirement by approximately \$2.8 million. The ultimate impact any future proceeding would also change based on interim retirements between base cases. Therefore, a specific calculation on how much impact there would be in future proceedings is not possible, given the Company does not know when it will file its next base rate case at this time. However, for purposes of providing indicative impacts, the removal of those amounts in this proceeding decreased the bill impacts for residential customers by 0.4% in this proceeding.

b. There would be carrying costs at the Company's weighted average cost of capital on any remaining plant balances. However, there would not be carrying costs associated with the actual depreciation expense to be reflected in the future proceedings because the carrying costs would only be applied to the plant balance.

Witness: Tanner S. Wolffram

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

**KPSC
PHDR_18** Refer to Kentucky Power's response to Commission Staff's Second Request for Information, Item 94, Attachment 1. Provide an update to the referenced spreadsheet through the most recent month for which hedging data is available. Separate incidental gas gains/losses from gas price hedging gains/losses.

RESPONSE

Please see KPCO_R_KPSC_PHDR_18_Attachment1.

Witness: Clinton M. Stutler

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Provide the application fees charged by Kentucky Power's sister utilities
PHDR_19 when a prospective COGEN/SPP customer seeks to connect distributed
 energy resources to their systems.

RESPONSE

See the table below for the current fees.

Company	Application fee structure
AEP Ohio	<ul style="list-style-type: none">• Level 1: \$50 + \$1/kW nameplate capacity• Level 2: \$100 + \$2/kW nameplate capacity
APCo- Virginia	<ul style="list-style-type: none">• Level 1: \$100• Level 2: \$1,000
APCo- West Virginia	<ul style="list-style-type: none">• Level 1: \$30• Level 2: \$50 + \$1/kW
I&M- Indiana	<ul style="list-style-type: none">• 10 kW or less = \$0• 10 kW to 2 MW= \$50 + \$1 per KW• Greater than 2 MW= \$100+ \$2kW
I&M- Michigan	<ul style="list-style-type: none">• Non-Export certified projects= \$100 + \$1 kWac• Uncertified \$100+ \$2 kWac

Witness: Tanner S. Wolfram

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC PHDR_20	Provide a breakdown of the costs incurred by Kentucky Power when an average COGEN/SPP customer seeks to connect distributed energy resources to its system.
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RESPONSE

Kentucky Power incurs several categories of costs to support distributed energy resource interconnections. First, Kentucky Power incurs direct labor costs associated with application review and processing. These labor costs include costs associated with distributed generation coordinators, distribution planning engineers who may be needed to perform technical screenings, meter technicians who update metering hardware and software to perform bi-directional power flow measurements, and others who may be needed to provide testing and commissioning services. Additionally, Kentucky Power incurs information technology costs associated with distributed energy resource interconnections. These IT costs include licensing and maintenance costs associated with the PowerClerk software and costs associated with IT support services necessary to perform needed system upgrades, manage integrations with other business systems, manage record retention, and track processing health. Kentucky Power also incurs administrative costs related to distributed generation resource interconnection in the associated with the development and execution of interconnection agreements (including Docusign costs), invoicing and payment processing, and updating billing systems to implement necessary changes. These costs are separate from the costs associated with further system impact studies.

Witness: Tanner S. Wolfram

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Provide copies of actual FlexPay billing statements from other American
PHDR_21 Electric Power service areas.

RESPONSE

Please see KPCO_R_KPSC_PHDR_21_Attachment1.

Witness: Stevi N. Cobern





Service Address:



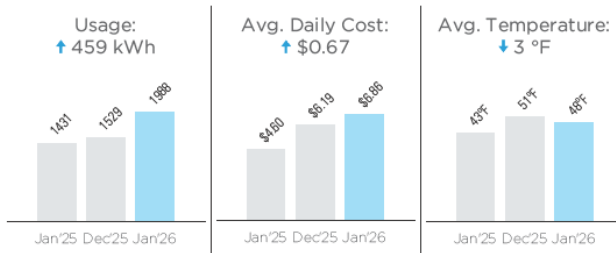
Account # [REDACTED]

Line Item Charges:

Date	Transaction	Tariff	Amount	Balance	Carryover
12/06/25	Daily Billing 70.0 kWh	15	-\$7.92	\$64.33	\$0.00
12/07/25	Daily Billing 63.0 kWh	15	-\$7.25	\$57.08	\$0.00
12/08/25	Daily Billing 69.0 kWh	15	-\$7.83	\$49.25	\$0.00
12/08/25	Payment		\$150.00	\$199.25	\$0.00
12/09/25	Daily Billing 73.0 kWh	15	-\$8.17	\$191.08	\$0.00
12/10/25	Daily Billing 52.0 kWh	15	-\$6.25	\$184.83	\$0.00
12/11/25	Daily Billing 46.0 kWh	15	-\$5.74	\$179.09	\$0.00
12/12/25	Daily Billing 54.0 kWh	15	-\$6.48	\$172.61	\$0.00
12/13/25	Daily Billing 62.0 kWh	15	-\$7.17	\$165.44	\$0.00
12/14/25	Daily Billing 76.0 kWh	15	-\$8.43	\$157.01	\$0.00
12/15/25	Daily Billing 64.0 kWh	15	-\$7.38	\$149.63	\$0.00
12/16/25	Daily Billing 74.0 kWh	15	-\$8.24	\$141.39	\$0.00
12/17/25	Daily Billing 69.0 kWh	15	-\$7.84	\$133.55	\$0.00
12/18/25	Daily Billing 48.0 kWh	15	-\$5.89	\$127.66	\$0.00
12/19/25	Daily Billing 41.0 kWh	15	-\$5.31	\$122.35	\$0.00
12/20/25	Daily Billing 75.0 kWh	15	-\$8.34	\$114.01	\$0.00
12/21/25	Daily Billing 49.0 kWh	15	-\$5.99	\$108.02	\$0.00
12/22/25	Daily Billing 53.0 kWh	15	-\$6.42	\$101.60	\$0.00
12/23/25	Daily Billing 53.0 kWh	15	-\$6.32	\$95.28	\$0.00
12/24/25	Daily Billing 56.0 kWh	15	-\$6.65	\$88.63	\$0.00
12/25/25	Daily Billing 46.0 kWh	15	-\$5.73	\$82.90	\$0.00
12/26/25	Daily Billing 62.0 kWh	15	-\$7.18	\$75.72	\$0.00
12/27/25	Daily Billing 42.0 kWh	15	-\$5.37	\$70.35	\$0.00
12/28/25	Daily Billing 35.0 kWh	15	-\$4.76	\$65.59	\$0.00
12/29/25	Daily Billing 52.0 kWh	15	-\$6.30	\$59.29	\$0.00
12/29/25	Payment		\$150.00	\$209.29	\$0.00
12/30/25	Daily Billing 101.0 kWh	15	-\$10.69	\$198.60	\$0.00
12/31/25	Daily Billing 58.0 kWh	15	-\$6.88	\$191.72	\$0.00
01/01/26	Daily Billing 95.0 kWh	15	-\$10.19	\$181.53	\$0.00
01/02/26	Daily Billing 52.0 kWh	15	-\$6.23	\$175.30	\$0.00
01/03/26	Daily Billing 60.0 kWh	15	-\$7.04	\$168.26	\$0.00
01/04/26	Daily Billing 54.0 kWh	15	-\$6.42	\$161.84	\$0.00
01/05/26	Daily Billing 63.0 kWh	15	-\$7.33	\$154.51	\$0.00
01/06/26	Daily Billing 58.0 kWh	15	-\$6.78	\$147.73	\$0.00
01/07/26	Daily Billing 19.0 kWh	15	-\$3.30	\$144.43	\$0.00
01/08/26	Daily Billing 44.0 kWh	15	-\$5.35	\$139.08	\$0.00
Ending Balance				\$139.08	\$0.00

Usage Details:

↑↓ Values reflect changes between current month and previous month.



Total usage for the past 12 months: 18,647 kWh

Average (Avg.) monthly usage: 1,554 kWh

Notes from PSO:

Current Fuel Factor 0.0269490 **per KWH**

Visit us at www.PSOklahoma.com

Detailed copy of rate schedule will be furnished upon request.

Due date does not apply to previous balance due.

View all payment assistance options at psoklahoma.com/assistance.

Enjoy the benefits of constant connection. Download our mobile app today, at Google Play and iTunes stores.





Service Address:



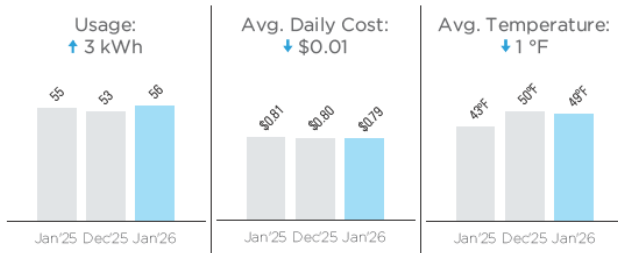
Account #

Line Item Charges:

Date	Transaction	Tariff	Amount	Balance	Carryover
12/11/25	Daily Billing 2.0 kWh	15	-\$0.84	\$4.31	\$0.00
12/12/25	Daily Billing 1.0 kWh	15	-\$0.70	\$3.61	\$0.00
12/13/25	Daily Billing 2.0 kWh	15	-\$0.84	\$2.77	\$0.00
12/14/25	Daily Billing 2.0 kWh	15	-\$0.84	\$1.93	\$0.00
12/15/25	Daily Billing 1.0 kWh	15	-\$0.69	\$1.24	\$0.00
12/15/25	Payment		\$20.00	\$21.24	\$0.00
12/16/25	Daily Billing 2.0 kWh	15	-\$0.88	\$20.36	\$0.00
12/17/25	Daily Billing 1.0 kWh	15	-\$0.64	\$19.72	\$0.00
12/18/25	Daily Billing 2.0 kWh	15	-\$0.87	\$18.85	\$0.00
12/19/25	Daily Billing 2.0 kWh	15	-\$0.87	\$17.98	\$0.00
12/20/25	Daily Billing 1.0 kWh	15	-\$0.67	\$17.31	\$0.00
12/21/25	Daily Billing 2.0 kWh	15	-\$0.84	\$16.47	\$0.00
12/22/25	Daily Billing 2.0 kWh	15	-\$0.85	\$15.62	\$0.00
12/23/25	Daily Billing 1.0 kWh	15	-\$0.69	\$14.93	\$0.00
12/24/25	Daily Billing 2.0 kWh	15	-\$0.84	\$14.09	\$0.00
12/25/25	Daily Billing 2.0 kWh	15	-\$0.86	\$13.23	\$0.00
12/26/25	Daily Billing 1.0 kWh	15	-\$0.64	\$12.59	\$0.00
12/27/25	Daily Billing 2.0 kWh	15	-\$0.91	\$11.68	\$0.00
12/28/25	Daily Billing 2.0 kWh	15	-\$0.83	\$10.85	\$0.00
12/29/25	Daily Billing 1.0 kWh	15	-\$0.64	\$10.21	\$0.00
12/30/25	Daily Billing 2.0 kWh	15	-\$0.87	\$9.34	\$0.00
12/31/25	Daily Billing 2.0 kWh	15	-\$0.86	\$8.48	\$0.00
01/01/26	Daily Billing 1.0 kWh	15	-\$0.72	\$7.76	\$0.00
01/02/26	Daily Billing 2.0 kWh	15	-\$0.79	\$6.97	\$0.00
01/03/26	Daily Billing 2.0 kWh	15	-\$0.87	\$6.10	\$0.00
01/04/26	Daily Billing 1.0 kWh	15	-\$0.70	\$5.40	\$0.00
01/05/26	Daily Billing 1.0 kWh	15	-\$0.67	\$4.73	\$0.00
01/06/26	Daily Billing 2.0 kWh	15	-\$0.80	\$3.93	\$0.00
01/07/26	Daily Billing 2.0 kWh	15	-\$0.88	\$3.05	\$0.00
01/08/26	Daily Billing 1.0 kWh	15	-\$0.65	\$2.40	\$0.00
01/09/26	Daily Billing 2.0 kWh	15	-\$0.92	\$1.48	\$0.00
01/10/26	Daily Billing 2.0 kWh	15	-\$0.80	\$0.68	\$0.00
01/11/26	Daily Billing 2.0 kWh	15	-\$0.79	-\$0.11	\$0.00
01/12/26	Daily Billing 1.0 kWh	15	-\$0.77	-\$0.88	\$0.00
01/12/26	Payment		\$20.00	\$19.12	\$0.00
01/13/26	Daily Billing 2.0 kWh	15	-\$0.80	\$18.32	\$0.00
Ending Balance				\$18.32	\$0.00

Usage Details:

↑↓ Values reflect changes between current month and previous month.



Total usage for the past 12 months: 753 kWh

Average (Avg.) monthly usage: 63 kWh

Notes from PSO:

Current Fuel Factor 0.0269490 per KWH

Visit us at www.PSOklahoma.com

Detailed copy of rate schedule will be furnished upon request.

Due date does not apply to previous balance due.

View all payment assistance options at psoklahoma.com/assistance.

Enjoy the benefits of constant connection. Download our mobile app today, at Google Play and iTunes stores.

Pay online for free when you sign up for paperless billing. Go to www.AEPPaperless.com to enroll today!





Service Address:



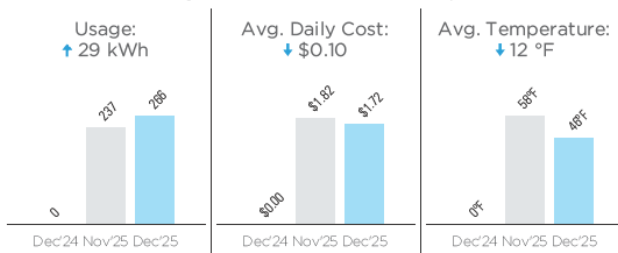
Account # [REDACTED]

Line Item Charges:

Date	Transaction	Tariff	Amount	Balance	Carryover
11/15/25	Daily Billing 6.0 kWh	28	-\$1.42	\$2.74	-\$673.16
11/16/25	Daily Billing 9.0 kWh	28	-\$1.85	\$0.89	-\$673.16
11/17/25	Daily Billing 18.0 kWh	28	-\$3.17	-\$2.28	-\$673.16
11/18/25	Daily Billing 10.0 kWh	28	-\$1.99	-\$4.27	-\$673.16
11/18/25	Payment		\$6.50	\$0.93	-\$671.86
11/19/25	Daily Billing 9.0 kWh	28	-\$1.84	-\$0.91	-\$671.86
11/20/25	Daily Billing 5.0 kWh	28	-\$1.31	-\$2.22	-\$671.86
11/20/25	Payment		\$5.00	\$1.78	-\$670.86
11/21/25	Daily Billing 6.0 kWh	28	-\$1.42	\$0.36	-\$670.86
11/22/25	Daily Billing 7.0 kWh	28	-\$1.57	-\$1.21	-\$670.86
11/23/25	Daily Billing 4.0 kWh	28	-\$1.10	-\$2.31	-\$670.86
11/24/25	Daily Billing 11.0 kWh	28	-\$2.22	-\$4.53	-\$670.86
11/24/25	Payment		\$15.00	\$7.47	-\$667.86
11/25/25	Daily Billing 4.0 kWh	28	-\$1.13	\$6.34	-\$667.86
11/26/25	Daily Billing 4.0 kWh	28	-\$1.15	\$5.19	-\$667.86
11/27/25	Daily Billing 10.0 kWh	28	-\$1.96	\$3.23	-\$667.86
11/28/25	Daily Billing 8.0 kWh	28	-\$1.75	\$1.48	-\$667.86
11/29/25	Daily Billing 6.0 kWh	28	-\$1.39	\$0.09	-\$667.86
11/30/25	Daily Billing 6.0 kWh	28	-\$1.47	-\$1.38	-\$667.86
12/01/25	Daily Billing 16.0 kWh	28	-\$2.87	-\$4.25	-\$667.86
12/01/25	Payment		\$20.00	\$11.75	-\$663.86
12/02/25	Daily Billing 8.0 kWh	28	-\$1.65	\$10.10	-\$663.86
12/03/25	Daily Billing 7.0 kWh	28	-\$1.59	\$8.51	-\$663.86
12/04/25	Daily Billing 7.0 kWh	28	-\$1.64	\$6.87	-\$663.86
12/05/25	Daily Billing 8.0 kWh	28	-\$1.71	\$5.16	-\$663.86
12/05/25	Payment		\$40.00	\$37.16	-\$655.86
12/06/25	Daily Billing 5.0 kWh	28	-\$1.25	\$35.91	-\$655.86
12/07/25	Daily Billing 8.0 kWh	28	-\$1.71	\$34.20	-\$655.86
12/08/25	Daily Billing 9.0 kWh	28	-\$1.92	\$32.28	-\$655.86
12/09/25	Daily Billing 7.0 kWh	28	-\$1.49	\$30.79	-\$655.86
12/10/25	Daily Billing 7.0 kWh	28	-\$1.58	\$29.21	-\$655.86
12/11/25	Daily Billing 6.0 kWh	28	-\$1.45	\$27.76	-\$655.86
12/12/25	Daily Billing 6.0 kWh	28	-\$1.47	\$26.29	-\$655.86
12/13/25	Daily Billing 7.0 kWh	28	-\$1.55	\$24.74	-\$655.86
12/14/25	Daily Billing 15.0 kWh	28	-\$2.72	\$22.02	-\$655.86
12/15/25	Daily Billing 14.0 kWh	28	-\$2.52	\$19.50	-\$655.86
12/16/25	Daily Billing 7.0 kWh	28	-\$1.56	\$17.94	-\$655.86
12/17/25	Daily Billing 6.0 kWh	28	-\$1.46	\$16.48	-\$655.86
Ending Balance				\$16.48	-\$655.86

Usage Details:

↑↓Values reflect changes between current month and previous month.



Total usage for the past 12 months: 7,092 kWh

Average (Avg.) monthly usage: 887 kWh

Notes from PSO:

Current Fuel Factor 0.0269490 **per KWH**

*City of Tulsa Ordinance 24695 requires PSO to calculate this fee on the total bill amount, which includes the franchise fee and the infrastructure fee.

Monthly Power Hours Summary

With Time of Day \$56.88
Standard Rate \$56.88
Current monthly savings \$0.00
Time of Day
Variance since 09/25/2025 -\$3.49

Visit us at www.PSOklahoma.com

Detailed copy of rate schedule will be furnished upon request.

Due date does not apply to previous balance due.

To avoid unnecessary delays in crediting your electric payment, please **do not paper clip or staple your check to the bill payment stub**.

*If you pay your electric bill in person, remember to pay only at **AUTHORIZED** pay stations. These locations send notice of your payment immediately to **Public Service Company of Oklahoma** which could prevent service disconnection. Pay stations may charge a fee for this service. Keep your receipt as proof of payment. For a list of authorized pay stations or other payment options, visit our website at www.psooklahoma.com or call the number above.**

View all payment assistance options at psoklahoma.com/assistance.

Enjoy the benefits of constant connection. Download our mobile app today, at Google Play and iTunes stores.

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Explain whether Kentucky Power could add a statement to FlexPay bills
PHDR_22 advising customers that they can contact Kentucky Power if they have
questions about how the daily charges included on the billing statement
are broken down between various bill components.

RESPONSE

Yes. The Company can add a bill message that advises customers to contact the
Company to discuss detailed bill charges assuming there is sufficient room on the bill for
any specific month.

Witness: Stevi N. Cobern

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

KPSC Explain whether a COGEN/SPP application will be considered filed for
PHDR_23 purposes of establishing a legally enforceable obligation as of the date it is
first submitted to Kentucky Power and any required application fee is paid
or some other date.

RESPONSE

COGEN/SPP application will be considered filed, for purposes of establishing a legally enforceable obligation, on the date a completed application— including a completed FERC Form 556 where applicable—is submitted to Kentucky Power and any required application fee is paid.

Witness: Tanner S. Wolfram

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026
Page 1 of 2

DATA REQUEST

- KPSC
PHDR_24** Refer to the January 15, 2026 Hearing Testimony of Michael M. Spaeth (Spaeth Hearing Testimony), H.V.T. at 10:52:09 in which he discussed prospective Qualifying Facility (QF) customers and the Rebuttal Testimony of Michael M. Spaeth, page R20, lines 20–21.
- a. Explain how long it generally takes the engineering team to determine whether additional studies are needed on a prospective Qualifying Facility (QF) that has provided all of the relevant information.
 - b. Explain whether Kentucky Power allows or will allow a prospective QF customer to contest a finding that additional studies are needed or the costs of the additional studies.
 - c. Explain how long a prospective QF customer would have to pay the additional study costs if an additional study is deemed necessary.

RESPONSE

- a. Kentucky Power uses a waterfall approach to approving DER interconnection applications, the goal of which is to allow an application to move forward with an appropriate level of review. All applications complete an initial “Auto Screen.” Notification of “Auto Screen” results typically occur within two business days of Kentucky Power confirming all relevant information is properly reflected in the online DER interconnection application system. Applications that fail “Auto Screen” are manually reviewed to determine if an additional “DP Screen (Distribution Planning)” is required or if they may be safely interconnected without additional analysis. Applications requiring a DP Screen will typically receive notification of passing the DP screen with no further analysis required or the need to proceed to a “System Impact Study” within one to three weeks of Kentucky Power confirming all relevant information is received. Most small applications (residential, single-phase, less than 25kW) successfully pass the “Auto Screen.”
- b. Kentucky Power allows prospective QF customers to engage in conversations with Kentucky Power’s distribution system subject matter experts to better understand the need for and cost of additional studies.

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026
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c. The Company's typical practice is 30 days.

Witness: Michael M. Spaeth

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026

DATA REQUEST

**KPSC
PHDR_25** Refer to the January 13, 2026 Hearing Testimony of Cynthia Wiseman, (Wiseman Hearing Testimony), H.V.T. at 02:11:28 in regard to Witness Wiseman's discussion on estimated usage on bills.

- a. Provide a spreadsheet that entails the reason a meter could not be accessed which resulted of an estimated bill for the test year in Excel spreadsheet format with all formulas, rows, and columns unprotected and fully accessible.
- b. Provide the data and justification of a "98 percent" successful meter read rate per month during the test year. If possible, provide the data separated by county or zip code.
- c. Provide and explain any written policy in regard to usage estimates on customer bills. Additionally, provide a detailed description on the methodology utilized by Kentucky Power to estimate a user's billing usage.

RESPONSE

- a. and b. Please see KPCO_R_KPSC_PHDR_25_Attachment1.
- c. Please see KPCO_R_KPSC_PHDR_25_Attachment2.

Witness: Stevi N. Cobern

A. Computer Estimated Bills

1. ESTIMATING FORMULAS

When meter readings for regular billings are not obtained by meter readers, readings may be estimated by the system or by the area office. For system estimations, MACSS uses "only" the average usage previous month and year ago method, the variance factor method or the previous usage a year ago method.

NOTE: For each cycle to be read and billed, MACSS will calculate an estimated usage using all three estimation methods for all the accounts that can be estimated in that cycle. The system will then, based on certain criteria, pick the best estimation method to use for that cycle. Therefore, it may appear that by looking at an individual account the best method would have been the average usage previous month and year ago method but the system, based on the overall view, elected to use the variance factor method.

All eligible accounts will be estimated by one or more formulas, depending on the data available for each meter. These formulas are:

VARIANCE FACTOR:

$$\text{KWH Previous Month} / \text{Bill Days Previous Month} \times \text{Variance Factor} = \text{Estimated KWH}$$

AVERAGE USAGE PREVIOUS MONTH AND YEAR AGO:

$$\frac{(\text{KWH Previous Month} + \text{KWH Year Ago Current Month})}{(\text{Bill Days Previous Month} + \text{Bill Days Year Ago Current Month})} \times \text{Bill Days Current Month} = \text{Estimated KWH}$$

PREVIOUS USAGE YEAR AGO:

$$\text{KWH Year Ago Current Month} / \text{Bill Days Year Ago Current Month} \times \text{Bill Days Current Month} = \text{Estimated KWH}$$

An explanation of each of the estimating formulas follows on the next page.
The estimating methods are described as follows:

1) Variance Factor Method

The Variance Factor Method involves a variance factor multiplier from a codes table. The revenue class is used to determine the account type and heating code. Refer to the WTMM (Codes Table Maintenance) conversation and Codes Table MCSC0106.

This codes table displays the Company number then the month the variance factors apply to. The variance factors are listed residential non-heating first, residential heating second and general service third.

The variance factor method is not used if the previous usage for a meter is zero.

4) **Average Previous Month Year Ago Method**

This method averages the daily usage from the previous month and year ago to compute an estimated reading.

5) **Year Ago Method**

The Year Ago Method uses the usage for the same month last year divided by the number of days in the current billing period.

2. THE ESTIMATING PROCESS

The system has the capability of evaluating each estimating method to determine which formula is the most accurate for each particular account. The estimating process is done by the system in the following manner; however, the Degree Day Method and the Cycle Trend Method are currently "not" being used.

The AEP estimation program uses three different estimation formulas or methods:

- 1) P.U. (prior usage) = average of this year's and last year's usages
$$\text{p.u} = (((\text{previous month's usage} + (\text{curr. mo.} - 12 \text{ usage})) / \text{usage \# days for both}) * (\text{\# days for current period}))$$
- 2) Y.R. (year ago) = (year-ago's usg / year-ago's usg # days) * (usg # days for curr. period)
- 3) V.F. (variance factor) = (previous month's usg / previous month's usg # days) * (v.f.)
* (# days for current period)
- variance factor is retrieved from codes table MCSC0106 and the key is the company# and the processing month

The estimation program attempts, with the available usages, to calculate estimations using as many of the above formulas as it can. Say, for instance, the previous month for a premise has a "good" usage (usage > 0, not estimated & not prorated) and also has a "good" usage 12 months prior, then the program will calculate multiple estimations using the three formulas listed above. For example, If we were to use August 2000 as the current billing month, then the P.U. estimation method would calculate the usage as (July 2000 usage + Aug. 1999 usage) / number of days for both usages * number of days in the current period. The estimated usage for the Y.R. method would be (Aug. 1999 / # days for Aug. 1999 usage period) * number of days in the current period. An estimated usage using the V.F. formula would also be calculated.

For each of the three methods, an attempt is also made to calculate estimated usages based on "prior" usages. For instance, if the current billing month to be estimated is August 2000, then the reading dates that will be used for estimating are as follows:

July	2000	= prev month (curr. mo. - 1)	(P1)	as referred to in the est. program
June	2000	= prev month - 1	(P2)	prior month
May	2000	= prev month - 2	(P3)	prior month
Aug	1999	= year ago (curr. mo. - 12)	(YR)	
July	1999	= year ago - 1	(YR1)	prior month
June	1999	= year ago - 2	(YR2)	prior month

The estimation program will (if good "prior" reading usages are available) calculate two more P.U. estimations. The P.U. estimate for July 2000 would be based on the "prior" P2 and YR1 usages. The P.U. estimate for

June 2000 would be based on the "prior" P3 and YR2 usages. The same holds true for the Y.R. and V.F. formulas, if, as stated before, the usages on the selected months are considered "good" usages.

Once all possible estimations have been calculated, the estimation program performs a **"select best method" routine**. In this routine, the percentage between the estimated amount for a given "prior" month and its corresponding actual billed usage is calculated ($\text{estm usage}/\text{actual billed usage}$). If the program was able to calculate estimates for two "prior" months, then the average of the two "prior" estimates is calculated. If the program was only able to estimate the "prior" month of, say, June 2000, then the percentage between the billed usage for June 2000 and its calculated estimated amount becomes the average percentage. The average percentage is calculated for each of the three estimation formulas (if a formula is not processed due to "bad" usages, then the average percentage for that formula is zero).

After calculating the average percentage, based on prior usages for each of the three estimation methods, the estimation program then performs a **"no good method" routine**. First, the difference between 100% and each of the calculated average percentages is moved to a whole number field that can be compared to a selected company tolerance level. Average percentage usage differences are sometimes referred to as trend factor average differences.

If the program was only able to calculate estimate(s) based either on the Y.R. method, or on previously estimated usages (when actual usages aren't available for the month(s) being processed), then the percentage differences are compared to an accuracy tolerance limit (codes table MCSC0233, keyed on company number). If all the calculated average percentage differences exceed this limit, or if they all equal zero, then the program marks the current period estimate as "no good".

The average percentage differences between the three estimation methods are now compared. The formula that produces the most accurate estimate (i.e., whose average is closest to 100% and not equal zero) is the formula that is selected. The estimate for the current period becomes the amount that was calculated using the previous month's usage and/or the year-ago usage of the selected "best" formula.

Validations are performed all throughout the estimation process. If during the above processes a validation fails (for example, not enough "good" readings were available), then an "estimation able to complete" flag is set to 'N' for no.

Upon exiting the estimation program, this flag is checked. If it is set to 'N', then several more attempts are made to come up with an estimate, based on the usages available. Some of these may be estimated usages. If these last attempts fail, then the program flags the account. If the meter reader is unable to obtain an actual reading, a Work Flow Manager (WFM) item is generated which identifies the account as "no bill" due to the fact that the program was unable to calculate an estimate for the current reading date.

3. ACCOUNTS FOR WHICH BILLINGS ARE NOT TO BE ESTIMATED

The following will not be estimated by the system:

- o Accounts with three (3) consecutive estimated bills, for all other operating companies. (Workflow is created)
- o Commercial and Industrial accounts with space heating (revenue classes 212 and 222 respectively)
- o Certain demand meters (except in emergency situations, such as severe weather. If demand meters are estimated, the first previous demand reading will be used). Refer to codes table MCSC0062 and note if the Tariff Estimate code is set to Yes, No or Emergency.
- o Reactive meters
- o TOD (Time of Day) meters
- o Transtext meters
- o Large commercial and industrial accounts

The system will check the following before estimating a regular scheduled bill:

- o Tariff Codes Tables (by company)
- o Customer tariffs coded "Do Not Estimate"
- o Meters coded "Do Not Estimate"

When an account with a demand meter can be estimated, the system will first check to determine if the previous demand meter reading in an initial reading. If it is and the reading is equal to zero, then the account will be flagged as "unable to estimate" and the system will "no-bill" the account.

Refer to the **MADJ-BPRM** (Billing Parameters) conversation policies and/or screen procedures for more information regarding these three conditions.

Refer to the **WTMM** (Codes Table Maintenance) conversation for more details on which tariffs can or cannot be estimated, Refer to Codes Tables MCSC0062.

4. FINAL BILLS

It is the general policy of most operating companies that meters serving residential and small commercial customers are left connected when the premises are vacated.

Subject to certain limitations, it is the policy of most operating companies to estimate the final meter readings and render the final bills on an estimated basis.

However, situations may occur when it will be advisable to obtain actual readings. When the employee feels that a fair and accurate estimate cannot be made, an actual reading should be obtained.

Various operating companies may have different policies regarding final readings and whether or not the meter should be disconnected. Refer to your individual operating company policy.

Estimation of final meter readings by the system will be based on the formulas used for estimating regular readings as outlined in Section A of these policies.

The following indicates accounts that require final meter readings and are not to be estimated:

- o Accounts where the meters are disconnected or removed
- o Demand metered accounts
- o Accounts coded "Do Not Estimate"
- o Newly Installed accounts where service has been used less than one month (Workflow)

For APCo., State of VA. only, the following applies to obtaining initial and final meter readings:

As provided by the Virginia State Corporation in its order in Case No. 19474 dated May 1, 1975, all initial and final bills will be based on actual readings rather than estimates.

In view of this requirement, when a customer requests service to be terminated and there is not a successive tenant, a disconnect order will be issued.

Validation has also been built in for accounts with a status of 'F', 'C', 'U', and 'X'. Since these types of accounts cannot be computer estimated, if no reading is obtained for a 6 month time period, a Work Flow Manager item will be produced to investigate the account.

B. Manually Estimated Bills

1. ESTIMATED READINGS BY AREA OFFICE

As the computer will not estimate readings under the conditions outlined in Section A, the area office must either obtain a reading or enter a manually estimated reading through the Hand Held Meter Reading system.

KWH meter readings manually estimated by the area office should be based on one of the formulas used by the computer that does not require pre-computed factors. If special or abnormal conditions indicate that the formulas are not applicable, the situation should be discussed with a marketing representative or the office supervisor.

The manual estimating of KWH and Demand meter readings on measured demand accounts should have the approval of the Marketing & Customer Services Department.

Readings which are manually estimated by the area office require the entry of Condition Code 96 into the Handheld Meter Reading system.

2. ESTIMATED READINGS FOR OPEN ORDERS

When service is requested at a location where the final reading was estimated, the account for the new occupant will start on the date on which they first occupied the premises. Unless a regular meter reading has been obtained in the meantime, the account is opened using the previous customer's estimated final reading. If an actual reading is obtained before the new customer occupies the premises, the account is opened by using the actual reading obtained by the meter reader.

Exceptions to the above may be made when usage has been recorded on the meter since the final reading was obtained. When this is known, the following should be used to determine the reading to be used when opening the account:

If the new customer acknowledges the use of all the energy, the previous customer's estimated final reading or the first actual reading obtained by the meter reader is used. The account is opened with the date on which the customer states they first occupied the premises.

If the customer acknowledges the use of only a portion of the energy, the effective reading is either a previous actual or an estimated reading. This depends on the date the premises were occupied by the present customer.

If the customer states that they just moved in and have not used any of the energy, a reading should be obtained for opening the account.

If a new customer has already opened an account with an over-estimated reading, the area office will change the present reading using the **CARR** (Cancel Adjust Rebill) conversation.

If this over-estimated reading error is not detected and corrected prior to the billing, the new account is not billed and the area office is advised of the condition by a Work Flow Manager item, Memo 3000, "KWH Meter Reading exceeds 75% of Capacity" and/or Memo 3035, "Current Actual Reading less than Previous Estimate".

3. ESTIMATING FINAL BILLS IN AREA OFFICE

In some instances it may be necessary for the area office to manually estimate final meter readings before the service orders are entered to the system. Subject to the limitations outlined in Section A, final readings may be estimated based on the formulas used for estimating regular readings.

Whenever a customer discontinues service and requests to settle the account immediately, a final bill is prepared by the area office. This final bill is only for the purpose of expediting the settlement of the account and does not alter the regular final billing procedure by the system.

If the amount of the final billing done by the system is different from the amount of the final billing done by the area office, the system calculated one will take precedence.

For more information on Final Bills, refer to Policies on General Billing, Section B.

4. ADJUSTMENTS RESULTING FROM ESTIMATED READINGS

Should a customer question an estimated final or initial bill, the account should be adjusted promptly to the complete satisfaction of the customer. Any adjustments required in this instance are done through the **CARR** (Cancel Adjust Rebill) conversation.

C. Estimation Emergency Override Code

The MACSS system provides the capability to estimate demand meters that average less than 20KW during emergency situations. Examples of emergencies are inclement weather, strike situations, etc. If an emergency situation exists, the area office must contact the GO Customer Services Manager and explain the situation.

To establish the emergency override code, the Customer Services Manager will authorize that the "Do Not Estimate Override Flag" on the Billing Parameter codes table, MCSC0435, be changed from "N" to "Y" by the MACSS Bill Calc team.

NOTE: This will affect estimations for the entire jurisdiction and not just an area. In addition, it is very important to reset the code from "Y" to "N" after billing has occurred.

NOTE: Meters should be uploaded on their scheduled reading dates during the Emergency Override period. If accounts that average more than 20 KW cannot be read, they can be manually estimated, pending or uploaded which would result in a no-bill.

Refer to the **MRPT WTMM** (Codes Table Maintenance) conversation to determine who has security to change and update this codes table.

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DATA REQUEST

**KPSC
PHDR_26** Refer to the January 13, 2026 Wiseman Hearing Testimony at H.V.T at 01:59:30 regarding customers with usage over 4,00kWh. Explain whether Kentucky Power could contact and perform an energy audit for the approximate 3,000 residential customers with regular usage above 4,000 kWh. Explain what other steps Kentucky Power could take to solve the issue of the amount of high energy users.

RESPONSE

The Company is in the process of pulling data on accounts that have had usage of 4,000 kWh or more in a given month. Based on that data, the Company will screen the housing stock associated with those accounts. Once that screening is complete, if the Company believes, based on the usage and housing stock, there is the potential need for additional weatherization, it will work with its DSM program administrator, TRC, to reach out to those customers and offer to perform an energy audit on those homes. That said, the Company cannot conduct home energy audits of customers' homes without their permission. Those energy audits will identify if certain weatherization or energy efficiency measures would be effective to reduce usage. The Company will inform the customer of the approved incentives for such measures through its DSM portfolio.

The Company will evaluate further DSM options once it understands the consistent items identified through the home energy audits. In early 2025, the Kentucky Power Foundation awarded \$1 million to Community Action agencies to assist customers with weatherization and home repairs. The Company is evaluating additional potential Kentucky Power Foundation grant options to potentially help offset the initial costs of some of the energy efficiency installation and home improvement costs identified through the home energy audits. Foundation grants come from shareholders and are not recovered in rates.

Witness: Cynthia G. Wiseman

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DATA REQUEST

KPSC Refer to January 15, 2026 H.V.T. at 09:18:46 in which Witness Spaeth
PHDR_27 discussed presenting residential rate design options to Kentucky Power.
Provide the data and analysis that aided in the determination of the
proposed residential rate design.

RESPONSE

Kentucky Power respectfully objects to this data request to the extent it requires the production of attorney-client privileged communications or documents protected by the attorney work product doctrine, including legal analysis and advice regarding legal and regulatory issues, risks, and potential outcomes in then-pending or anticipated regulatory proceedings, and analysis prepared at the request of counsel in anticipation of regulatory proceedings. Kentucky Power is filing a privilege log identifying the documents with respect to which the privilege and doctrine are being asserted. Subject to and without waiving these objections, the Company states as follows:

The rate design process was highly iterative. The Company used every individual residential customer bill as the basis of the analysis. The Company considered many combinations of number of rate designs, energy blocks, number of customer charge tiers, block/tier thresholds, rates, and customer-related cost recovery percentages in order to provide winter bill relief for high usage customers and bill stability throughout the calendar year while still adhering to principles of gradualism. As examples, the Company analyzed rate designs with: seasonal rates, winter tail blocks, and all combinations of blocked/tiered energy and customer charges up to 3 of each. All these options were considered and evaluated based on bill impacts, particularly at the seasonal (winter vs non-winter) averages of electric and non-electric heating customers. These options were presented to Kentucky Power management for consideration and the Kentucky Power team determined that a multi-tiered customer charge and declining variable rate was the preferred option. The Company weighed the tradeoffs of positive impacts on high-usage customers against higher bill impacts on lower usage customers (e.g. for any dollar that one customer's bill decreases, another must increase to maintain revenue neutrality). Ultimately, it was determined that the relatively small dollar impact values to low-usage customers was fitting to provide rate relief to high-usage customers, with the additional benefit of more accurately aligning rates with costs.

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Once the new rate design proposal was selected, the pricing team ran various scenarios to set the tier levels based on the cost-of-service in this case, ultimately leading to the two-tiered customer charge and two-tiered declining variable rate proposed in this case. Those other various scenarios were conducted using the workpaper provided as KPCO_R_KPSC_2_19_Attachment1 but, given the iterative nature of this process, the Company only retained the as-proposed rate design in that workpaper.

Witness: Michael M. Spaeth

Respondent: Counsel (as to objections)

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DATA REQUEST

**KPSC
PHDR_28** Refer to the January 15, 2026 Spaeth Hearing Testimony H.V.T at 10:08:41 in which Witness Spaeth discussed Kentucky Power's attachment provided in response to Commission Staff's Second Request for Information, Item 19, "KY Res Customer Usage_Wthnrm" tab. Provide a detailed table using the unadjusted residential usage data for the test year broken out by structure type (hunting cabins, barns, etc.) in percentage of and total amount of residential customers.

RESPONSE

The Company does not maintain holistic records of the housing and structure types of its residential customers. However, for some customers, the Company has records of their housing type. The recorded structure type designations are also limited, so the Company cannot specifically identify hunting cabins or barns. The table below summarizes the data that the Company does have as requested. The building category data is established at the time of account creation, and does not necessarily accurately reflect anyone who has moved since that time.

Building Category	Number of Customers	% of Customers
APARTMENT	10,641	8.00%
CONDOMINIUM	130	0.10%
GARAGE	538	0.40%
HOUSE	64,539	48.54%
MOBILE HOME IN TRAILER PARK	2,134	1.61%
MOBILE HOME OUT TRAILER PARK	32,933	24.77%
MODULAR HOME	2,587	1.95%
NON-RESIDENTIAL	1,955	1.47%
RECREATIONAL VEHICLE	301	0.23%
TEMPORARY SERVICE	428	0.32%

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UNKNOWN	16,762	12.61%
Grand Total	132,948	100.00%

Witness: Michael M. Spaeth

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DATA REQUEST

KPSC Refer to the Rebuttal Testimony of Michael Spaeth at R6. Provide all of
PHDR_29 the data and analysis used to develop the usage statistics mentioned in the
testimony.

RESPONSE

All the data and analysis informing R6 of Spaeth Rebuttal Testimony is contained in
KPCO_R_AG_KIUC_2_18_Attachment1.

Witness: Michael M. Spaeth

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DATA REQUEST

**KPSC
PHDR_30** Refer to the Application, Section II, Volume I, Exhibit F at 7. Refer also to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 55, Attachment 29, Spaeth WP9, row 16. Reconcile the discrepancy between the \$183.37 current bill amount on the customer notice, and the current base bill, \$174.70, and total current bill amount, \$214.47, in the work paper.

RESPONSE

There is no discrepancy. The two bill amounts represent different statistics.

On the customer notice, the bill is the quotient of Total TY Per Books Revenue for RS and the Year End Adjusted # of Customers. This yields the AVERAGE current bill. Said another way, if the Company perfectly split the revenues up to each customer, their bill would be \$183.37 at present, and \$211 with the proposed revenue requirement. This methodology comports with the Company's standard and historical filing requirements.

In Spaeth WP9, TYPICAL bills are shown. This represents what a customer's bill would be if they had a certain amount of usage in a month. For the average Kentucky Power customer, using 1,210 kWh in a month, their current and proposed bill amounts are calculated and shown.

If the Company had a perfectly "normal" distribution of customers, these values would be the same. However, the Company has a varied customer base, and so the values are not precisely the same.

Witness: Michael M. Spaeth

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DATA REQUEST

**KPSC
PHDR_31** Refer to the Rebuttal Testimony of Tanner Wolffram (Wolffram Rebuttal Testimony), page R16. It is stated that Kentucky Power does not currently have sufficient metering data to allow it to conduct the analysis witness Colton recommended. However, with the ongoing deployment of AMI meters, explain whether Kentucky Power would be able to monitor and notify customers who may benefit from switching to the residential time-of-day rate when there is a clear financial benefit for the customer over the 12-month period once AMI meters were installed.

RESPONSE

The Company intends to promote time-of-day rates to customers as AMI meters are rolled out. The Company can use the additional usage data available from AMI meters to compare a customers' current tariff to time-of-day rates on a case-by-case basis, if the customer requests that information. This comparison will allow the customer to determine if changing to a new tariff may be beneficial. Doing so for all customers irrespective of whether the customer asks for such information, as proposed by witness Colton, would be time- and cost-prohibitive.

Witness: Stevi N. Cobern

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DATA REQUEST

**KPSC
PHDR_32** Refer to the Wolfram Rebuttal Testimony, page R16. If Kentucky Power were to expand the outreach and participation of the Residential Time-of-Day rates, explain whether it could reduce bill volatility for customers who would benefit from the rate.

RESPONSE

Customer bill volatility is primarily determined by weather and seasonal conditions, leading to spikes in energy usage. The higher the energy rate, the more seasonal volatility is experienced. Time-of-day rates are not designed to reduce bill volatility. Instead, they are designed to incentivize shifting customer usage out of on-peak hours and into the off-peak hours. Time-of-day rates introduce additional potential volatility if a customer does not maintain consistent on and off-peak usage, on top of seasonality. For a typical customer who does not consider their timing of electricity usage, time-of-day rates can be highly volatile.

Witness: Stevi N. Cobern

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DATA REQUEST

**KPSC
PHDR_33** Refer to January 15, 2026 Spaeth Hearing Testimony, H.V.T. at 10:45:46 in which Witness Spaeth discussed LIHEAP customer usage data. Provide the past three calendar years of monthly kWh frequency distributions for residential and residential LIHEAP customers. Provide a document that compares this data with the data submitted in response to Commission Staff's Sixth Request for Information, Item 11 and Commission Staff's Post Hearing Request for Information, Item 5 in Case No. 2023-00159.

RESPONSE

In preparation for this response, the Company pulled the assisted customer data in the Company's response to Staff's Sixth Request for Information, Item 11 and Commission Staff's Post Hearing Request for Information, Item 5 in Case No. 2023-00159. Based on a review of that data, the Company found discrepancies in the data and, given that, it is impossible to accurately reconcile and compare the previous data set to the Company's filed response to Joint Intervenors First Request for Information, Items 52 and 95, located in KPCO_R_JI_1_52_Attachment1.

Certain assisted customer's usage was doubled because of the discrepancy, resulting in higher average usage statistics compared to the accurate report in the above attachment. Every possible measure was taken to try to posthumously reconcile the 2020-2022 data, but due to the Company's billing system's three-year limit on data retention, there is no comprehensive way to correct the issue for that entire time period. However, the Company has confirmed the data for the last 36 months is correct.

See KPSC_R_PHDR_33_Attachment1 for the requested frequency distributions for the last 36 months, excluding 2020-2022 LIHEAP data because of the discrepancy detailed above.

Witness: Stevi N. Cobern

Witness: Michael M. Spaeth

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DATA REQUEST

**KPSC
PHDR_34**

Refer to the Application, Section II, Volume 1, Exhibit D at 12,
Monitoring Usage procedure.

- a. Provide and explain multiple examples of a usage deviation that would trigger Kentucky Power to contact a customer.
- b. Explain the method in which Kentucky Power contacts a customer with a usage deviation.
- c. Explain what types of solutions Kentucky Power could provide a customer who is experiencing a usage deviation that does not involve a faulty meter.
- d. Explain how the implementation of an AMI meter impacts the Monitoring Usage procedure.

RESPONSE


- a. Please see KPCO_R_KPSC_PHDR_34_Attachment1 for examples of the calculation used to determine if the usage deviation requires additional review.
- b. The Customer Services group will first try to contact the customer by phone. If unable to reach the customer by phone, then an email will be sent (if there is an email address on file) or a letter will be mailed.
- c. When discussing usage variations with customers, especially if the usage causes a higher-than-expected bill, the Company will review the usage and try to help the customer determine what may be impacting their usage. Please see KPCO_R_KPSC_PHDR_34_Attachment2 which shows a document customers can review and includes many talking points discussed with customers. The Company also will discuss energy efficiency tips, available programs and billing or credit options available. Options available for residential customers include the Average Monthly Payment (AMP) plan, budget billing (excluding January through March), payment arrangements, payment extensions, DSM programs, assistance programs such as HEART, THAW, LIHEAP or contacting 211. If the account has a pending disconnection, additional options may be available such as a Certificate of Financial Need or medical certificate.

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d. Implementation of AMI will not impact the calculation of usage deviation discussed in subpart a. However, the granular usage data available with AMI can be used by the Customer Services group to more accurately discuss and resolve customer usage concerns. Specifically, the more detailed usage data allows the Company to pinpoint times in which usage increases or decreases to help determine what may be affecting usage. Additionally, customers who make adjustments in the way they use energy can easily monitor usage by accessing their energy portal to track usage.

Witness: Stevi N. Cobern



ELECTRIC USAGE CHECKLIST	
Was the weather unseasonably hot or cold during this billing period? Outside temperatures can cause heating and cooling systems to use more energy even with the same thermostat setting.	
Was the billing period longer than normal? Extra days in the billing period increase the cost of the bill.	
Check to make sure the bill is a one-month bill and does not include a previous balance.	
Are there any additional fees on the bill such as a deposit or a reconnect fee?	
Compare the usage listed on your bill from the same time last year. Similar usage may indicate increased usage is seasonally related.	
Ensure the heating or cooling system is working properly.	
Check the heating or cooling system filter and clean or replace if dirty. The Department of Energy (DOE) recommends cleaning or replacing filters every one to two months.	
Has your heating system been running on auxiliary or emergency heat? When temperatures dip below freezing, heat pumps rely on auxiliary heating strips to effectively heat your home. These heating strips can use five to six times more energy than a heat pump in normal operating mode.	
Look at your thermostat setting. The DOE recommends that the thermostat is set to 78 degrees in the summer and 68 degrees in the winter, when the home is occupied. It is important to change the thermostat settings gradually in the winter. Raising the thermostat setting by more than two degrees at a time may turn on the heat pump's costly auxiliary heat to help reach the desired temperature.	
Did you have any appliances repaired during the last month?	
Have you bought new appliances or are old ones going bad? A bad heating element in a hot water heater or a malfunctioning heat pump can cause longer run times and increased usage.	
Did your living habits change? For example, a child home from school or college during the summer, a guest visiting for several weeks, or someone in the home recently retired. Additional house guests or a change in consumption can also increase hot water heater usage. The DOE recommends insulating the water heater pipes and a thermostat setting of 120°F to help save energy.	
Are you using any seasonal equipment such as a pool or space heater? Running a typical space heater four hours a day during the winter months can add approximately \$30 to your monthly bill.	

Tracking Electric Usage

Tracking electric usage may show patterns that could help determine what is impacting your bill. If you can safely obtain a meter reading, track your readings at the same time each day for several days. The new reading is subtracted from the previous reading to determine the number of kilowatt hours (kWh) used. Compare daily readings to electric usage checklist items such as a hotter or colder day, a change in thermostat setting, extra laundry completed or more hot water used.



Day 1 Date: _____ Time: _____ kWh: _____

Day 2 Date: _____ Time: _____ kWh: _____

Day 2 kWh - Day 1 kWh = _____ kWh used

Day 3 Date: _____ Time: _____ kWh: _____

Day 3 kWh - Day 2 kWh = _____ kWh used

Day 4 Date: _____ Time: _____ kWh: _____

Day 4 kWh - Day 3 kWh = _____ kWh used

Kentucky Power compiled this checklist as a tool to help customers track and better understand their energy usage. Additional energy efficiency tips can be found at KentuckyPower.com/Savings.

We're Here to Help

From payment plans to service requests, we're ready to provide you with reliable support and energy solutions you can use. Visit KentuckyPower.com/Contact or call 800.572.1113 to get the help you need today.

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DATA REQUEST

KPSC Refer to the January 14, 2026 Hearing Testimony of Stevi Cobern
PHDR_35 (Cobern Hearing Testimony) H.V.T. at 05:54:27 in which Witness Cobern discussed Kentucky Power's billing system.

- a. Explain what the term "checkpoint" means and how that functions.
- b. Provide the "checkpoint" thresholds for a residential customer.

RESPONSE

a. The Company's billing system has various built in "checkpoints" or validations that will indicate if usage needs to be reviewed by a specialty group. For example, a "checkpoint" may be used to flag usage that is significantly higher or lower than previous average usage or for a General Service account that has usage which exceeds 4,450 kWh and may need a demand meter installed.

b. The "checkpoint" threshold for residential customers varies based on each individual customer's usage history and is calculated based on average usage. Please see KPCO_R_KPSC_PHDR_34_Attachment1 for an example of the calculation used. In the example, the account's "checkpoint" for high usage is 4,655 kWh and low usage is 238 kWh.

Witness: Stevi N. Cobern

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DATA REQUEST

KPSC Refer to the January 14, 2026 Cobern Hearing Testimony H.V.T. at
PHDR_36 05:57:17 in which Witness Cobern discussed Kentucky Power's previous
issue of longer billing cycles appearing on bills. Explain what Kentucky
Power has done, and is continuing to do, to make sure that billing cycles
do not exceed the typical 30 days.

RESPONSE

A typical billing cycle ranges from 28 to 32 days, however, previously in the months of December and January, customers could see billing cycles extend to 35 days. The longer billing cycles were caused by holidays when meters are not read and bills do not issue. To address this concern, the Company worked diligently to create a solution that shifts longer billing cycles from winter months when customers often use more power to a shoulder month when less power is historically used.

To achieve shorter billing cycles during the winter, the Company completed readings for two billing cycles on 12/1, 12/2, 12/30 and 12/31 rather than one billing cycle. In March and May, the Company will have two days when meters are not read, syncing the meter reading schedule back to normal.

Witness: Stevi N. Cobern

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DATA REQUEST

KPSC Refer to January 14, 2026 Cobern Hearing Testimony at H.V.T. at
PHDR_37 6:02:36. Explain why Kentucky Power could not improve transparency on
a customer's FlexPay bill by adding the daily amount of surcharges and
riders.

RESPONSE

As explained in response to KPSC 2_38, the Company asked its IT-team to determine if adding such functionality would be possible and determined it may be possible, but that it would require additional evaluation to determine the time and added cost to do so. Regardless, the Company has explained that, to the extent a FlexPay customer wishes to have that level of detail, the customer may request it and the Company will provide it.

Please see KPCO_R_KPSC_PHDR_18_Attachment1 to view copies of bills for existing pre-pay customers from a Kentucky Power affiliate. The transaction summary on the second page of the bill takes up nearly the entire page when listing only the daily balance and payments. Including surcharges and riders for each daily transaction would make a bill significantly longer and could make the bill more confusing.

Witness: Stevi N. Cobern

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DATA REQUEST

KPSC Refer January 14, 2026 Cobern Hearing Testimony at H.V.T at 06:01:06
PHDR_38 regarding FlexPay customers and reporting of disconnections. For a customer under FlexPay, if there were multiple instances of disconnections in a given month, explain how this situation may impact the disconnection report filed annually with the Commission.

RESPONSE

For all customers with an AMI meter, the Company will have the ability to track a disconnection for non-payment similar to how that information is currently tracked for AMR meters. The Company will continue to file reports annually providing the number of service terminations and reconnections. Should a customer on FlexPay have their service disconnected twice in one month, that will reflect as two service terminations on that month's reports.

Witness: Stevi N. Cobern

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DATA REQUEST

**KPSC
PHDR_39** Refer to Kentucky Power's attachment in response to Commission Staff's First Request for Information, Item 55, attachment 28, "Exhibit H" tab. Refer also to Kentucky Power's attachment in response to Commission's Staff's Second Request for Information, Item 19, "KY Res Customer Usage_Wthnrm" tab. Explain, in detail, what types of scenarios resulted in approximately 15,000 accounts to be adjusted out of the test year residential customer total.

RESPONSE

There is no such residential customer account adjustment. Counting the number of rows in the rate design workbook does not inform the Company's customer count. Each row reflects a customer that was connected to or disconnected from the system during the test year, regardless of whether they were connected for the full year. For example, a customer who began service in July will have a kWh usage of "0" for January-June. These "0 Bills" were not included for the purposes of calculating the rate design.

In KPSC_2_19_Attachment1, on the sheet "Rate Block Inputs", the table "Adjustment to Final Billing Units" shows the Company tying the "RD", or Rate Design, billing units, calculated on the "KY Res Customer Usage_Wthnrm" tab, to "BU", or billing units. The "BU" values are pulled directly from the support of Exhibit H, inclusive of storage water heating and employee customer charges. For the purposes of developing the customer charge, what matters is the number of bills, not the number of unique customers. The customer count Exhibit H reflects the number of bills divided by 12 to reach a customer count equivalent that is accurate to billing units.

Witness: Michael M. Spaeth

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DATA REQUEST

**KPSC
PHDR_40**

Refer to the Direct Testimony of Michael Spaeth at 14, Figure MMS-3. Explain the impact and provide a chart similar to MMS-3 for the following scenarios:

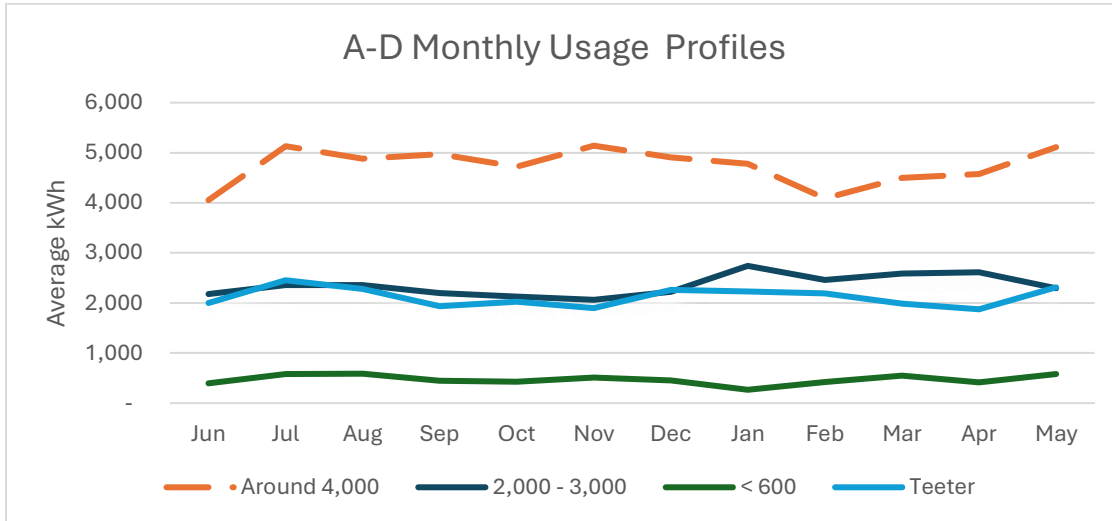
- a. A comparison of the proposed and a standard monthly bill for a residential customer who uses less than 600 kWh every month.
- b. A comparison of the proposed and a standard monthly bill for a residential customer who teeters around the 2,000 kWh threshold every month.
- c. A comparison of the proposed and a standard monthly bill for a residential customer who uses more than 2,001 kWh per month but less than 3,000 kWh per month every month.
- d. A comparison of the proposed and a standard monthly bill for a residential customer who uses around 4,000 kWh every month.

RESPONSE

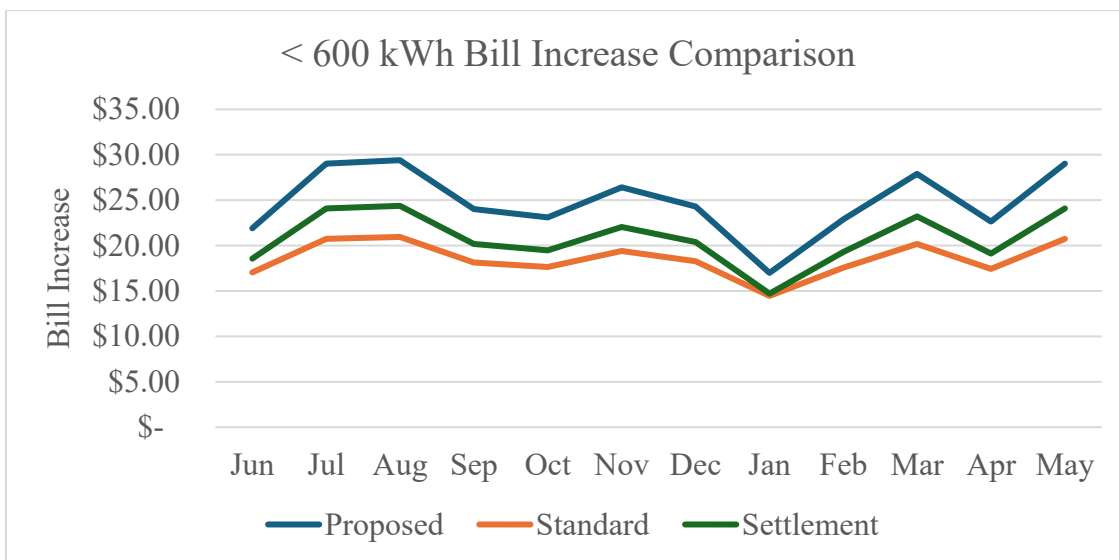
First, it is important to consider that none of the following scenarios are representative of a typical customer. Customer usage is highly dependent on weather and seasonal conditions. It is fairly irregular for a customer's usage to stay below 600 in all months, or to stay above 2,000 in all months, and it would be extremely irregular for a customer to experience usage over 4,000 in all months. The rate design is not seasonal, so if a customer experiences the same usage each month, their bill will be the same each month and will match the typical bill at the corresponding kWh.

For the following responses to parts a-d, four customer accounts with usage profiles similar to the requested ranges were chosen, depicted in the chart below. These kWh usage values were used to calculate the bill increases in response to parts a-d, with settlement rates included.

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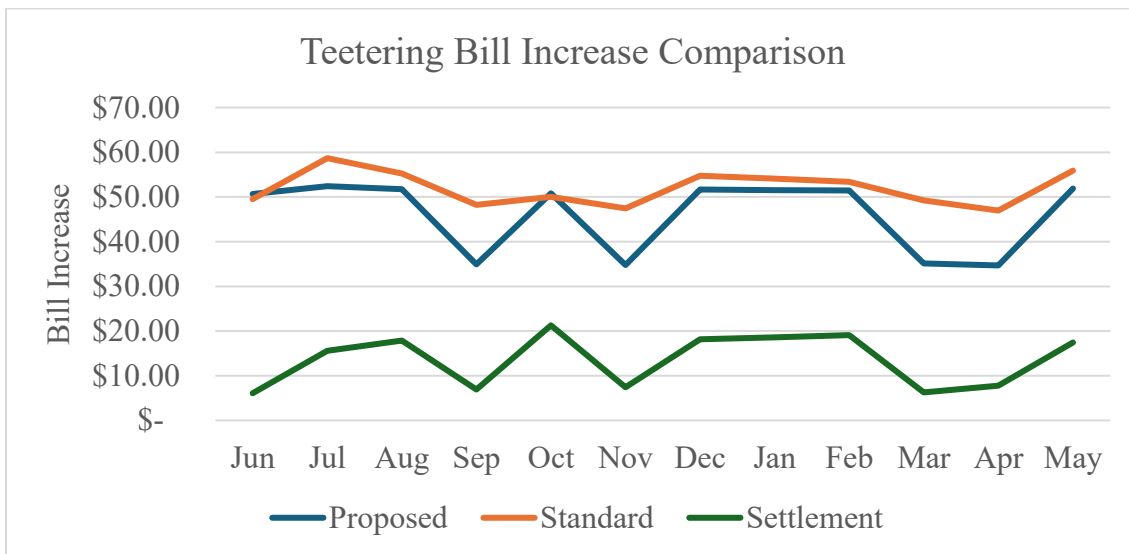


a. See chart below. For the lowest usage customers, the proposed rate design results in a larger bill increase than a standard rate design. In terms of dollar impact, however, the maximal difference is only \$8.46 in August between the proposed and standard. The settlement results in only a \$3.43 increase over the standard design. Overall, the increased fixed cost recovery through the basic service charge results in increases for the lowest usage customers that are relatively small in absolute dollar amounts.



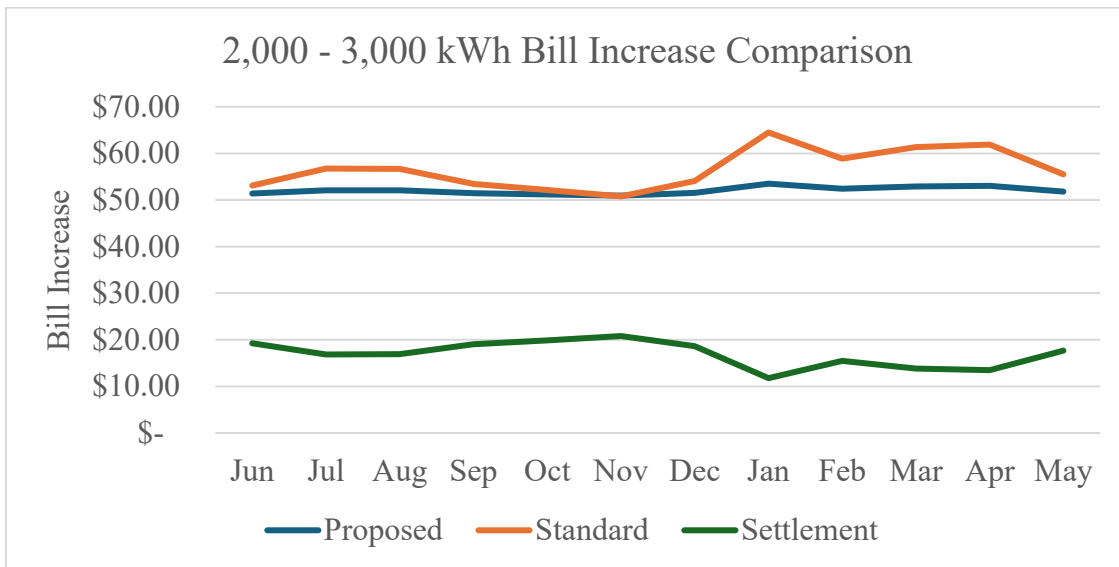
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b. See chart below. First, note that this “Teetering” customer crosses the 2,000 kWh customer charge tier threshold seven times in twelve months. Even still, the customer’s bill is only higher on the proposed compared to the standard rate design in October thanks to the decreasing blocked energy charge. The settlement rate design and DTL rider noticeably reduce the bill increase, resulting in bill increases less than \$10 in multiple months.



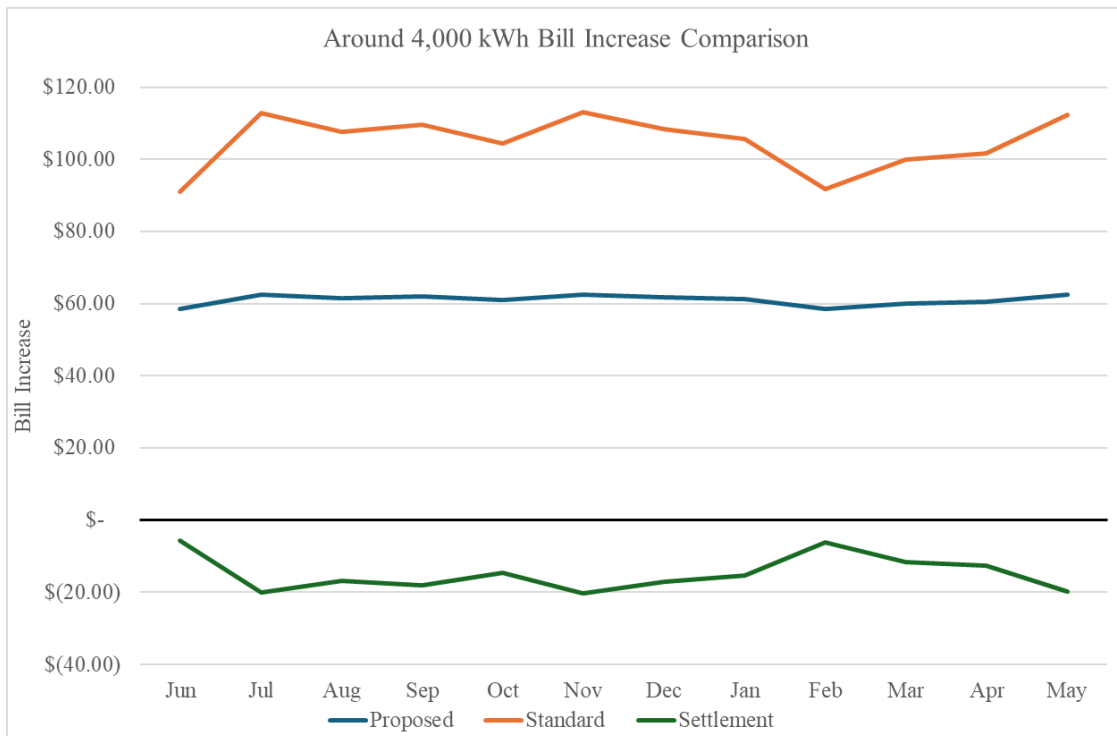
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c. See chart below. For this customer, who consistently stays above 2,000 kWh of monthly usage, the proposed rate design adds virtually no additional bill volatility, and saves the customer money on every winter bill. As the usage is higher, the substantial impact of the settlement rate's decreased second energy block combined with the DTL rider results in relatively minor bill increases for such a high usage customer.



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d. See chart below. For a customer with usage this consistently high, notice the substantial impact of both the proposed rate design, and the settlement especially. The settlement results in a bill decrease for every month of the year, as large as \$20 in July and November. The smoothing effect on bill volatility is also clear compared to the standard rate design.



Witness: Michael M. Spaeth

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DATA REQUEST

**KPSC
PHDR_41**

Refer to the January 13, 2026 H.V.T. at 03:19:20 discussing Figure JDN-1 from the Direct Testimony of Jeffrey D. Newcomb (Newcomb Direct Testimony). Refer to Newcomb Direct Testimony at 8 and Figure JDN-1 which stated that Kentucky Power's earned Return on Equity (ROE) at the end of its test year, May 2025, was approximately 3.9 percent. Refer also to Case No. 2023-00159,2 specifically the Direct Testimony of Cynthia G. Wiseman at 13 and Figure CGW-2.

- a. Confirm that Kentucky Power's earned ROE in March 2023, at the end of the test year in its prior rate case, was approximately 2.9 percent.
- b. Provide when the increased rates that resulted from Case No. 2023-00159 went into effect.
- c. Explain what material changes to Kentucky Power's financials occurred between the end of the test period and the effective date in that proceeding such that, following the implementation of rates, Kentucky Power's earned ROE has not exceeded 5 percent, according to Figure JDN-1.
- d. Explain whether Kentucky Power anticipates those same material changes in its financials between the test period and effective date in this proceeding.
- e. Explain whether, and if so how, the calculation of the earned ROE in Figure JDN-1 accounted for the deferral of the return associated with the net operating loss carryforward deferred tax assets included in the settlement in Case No. 2023-00159, e.g. were the DTAs included in rate base when calculating the earned ROE; or were the deferred return amounts included in the calculation of income.
- f. Explain whether, and if so how, the transmissions mission expense adjustment initially rejected in Case No. 2023-00159 was included in the calculation of the earned ROE in Figure JDN-1.

RESPONSE

- a. Confirmed.

Kentucky Power Company
KPSC Case No. 2025-00257
Commission Staff's Post-Hearing Data Requests
Dated January 20, 2026
Page 2 of 3

b. The rates approved in Case No. 2023-00159 were effective for services rendered on and after January 16, 2024, in accordance with the Commission's January 19, 2024 Order.

c. There were factors that occurred both before and after the effective date for rates in that proceeding that have caused Kentucky Power to not be able to earn the ROE approved by the Commission in its 2023 base rate case. The significant drivers include but are not limited to: the disallowance of the annual \$14.2 million PJM LSE OATT expense adjustment; increases in interest expense after the test-year; the suspension of collection of the Tariff P.P.A. Under-Recovery Regulatory Asset and the Decommissioning Rider coupled with the several-month delay in securitization; removal of PJM LSE OATT cost-tracking through Tariff P.P.A.; unrecoverable compensation expenses and other O&M expenses; and continued loss of load after billing determinants were set in the Company's 2023 base case.

d. There is a possibility that some of the items listed above may impact the Company's ability to earn its authorized ROE, but the Company cannot state definitely that they will. For example, there could be an increase or decrease in interest expense after rates are set that may negatively or positively impact the Company's ability to earn its authorized ROE because the Company has no way to address changes in interest expense in rates absent filing another base rate case. Additionally, the Company's ability to earn its authorized ROE will depend on the Commission's approvals in this case. If the Commission disallows recovery of certain expenses that are included in the Company's cost-of-service and Stipulation, such denials will negatively impact the Company's ability to earn its authorized ROE, holding all else equal, because the Company's cost-of-service in this case is based on historical data that reflects the actual costs incurred to provide service.

That said, there will no longer be any impact associated with the suspension of collection of the Tariff P.P.A. Under-Recovery Regulatory Asset and Decommission Rider because securitization occurred in June 2025.

e. The calculation does not account for the return associated with the NOLC DTA because those amounts have not yet been approved for inclusion in rate base and therefore are not being collected so as to be included in operating income.

Kentucky Power Company
KPSC Case No. 2025-00257
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Dated January 20, 2026
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f. The disallowance of the PJM LSE OATT expense adjustment was accounted for in the calculation of Kentucky Power's earned ROE in Figure JDN-1. The inability to recover that annual \$14.2 million known and measurable expense adjustment negatively impacted the Company's ability to earn its authorized ROE as the Company's rates were not sufficient to cover the level of expense the Company actually incurred, thereby creating an drag on earnings.

Witness: Tanner S. Wolffram

VERIFICATION

The undersigned, Stevi N. Cobern, being duly sworn, deposes and says she is a Regulatory Consultant Principle for Kentucky Power, that she 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 her information, knowledge, and belief.

Stevi N. Cobern

Stevi N. Cobern

Commonwealth of Kentucky)

)

Case No. 2025-00257

County of Boyd)

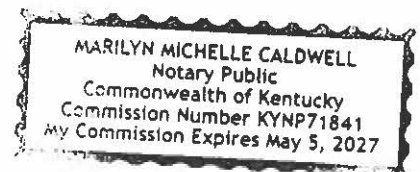
)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Stevi N. Cobern, on January 21, 2026.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841



VERIFICATION

The undersigned, David A. Hodgson, being duly sworn, deposes and says he is the Managing Director, Tax Accounting and Regulatory for American Electric Power Service Corporation, that he has personal knowledge of the matters set forth in the foregoing testimony and the information contained therein is true and correct to the best of his information, knowledge, and belief after reasonable inquiry.



David A. Hodgson

State of Ohio

)

County of Franklin

)

Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by David A. Hodgson, on January 22, 2026



Notary Public

Pauline A Lutz
NOTARY PUBLIC
State of Ohio
My Commission Expires 9/12/2026

My Commission Expires _____

Notary ID Number 2016-RE-600919

VERIFICATION

The undersigned, Franz D. Messner, being duly sworn, deposes and says he is the Managing Director of Corporate Finance for American Electric Power Service Corporation, 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.



Franz D. Messner

State of Ohio)
County of Franklin)

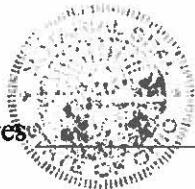
Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Franz D. Messner, on January 22, 2026



Notary Public

My Commission Expires



Davis C. House, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 117.03 R.C.

Notary ID Number _____

VERIFICATION

The undersigned, Michele Ross, being duly sworn, deposes and says she is a Vice President of Distribution Region Operations for Kentucky Power, that she 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 her information, knowledge, and belief.

Michele Ross
Michele Ross

Commonwealth of Kentucky)
)
County of Boyd)

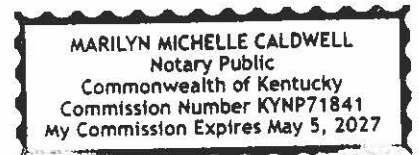
Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Michele Ross, on January 22, 2026.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841



VERIFICATION

The undersigned, Michael M. Spaeth, being duly sworn, deposes and says he is the Regulatory Pricing and Analysis Manager for American Electric Power Service Corporation, 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.

Signed by:



E3A0B4D49022420...

Michael M. Spaeth

Commonwealth of Kentucky)

)


Case No. 2025-00257

County of Boyd)

)

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Michael M. Spaeth, on _____.

Signed by:



E9B1BC7AC31F421

Notary Public

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
COMMONWEALTH OF KENTUCKY
Commission #KYNP71841
My Commission Expires 5/5/2027

My Commission Expires _____

Notary ID Number _____

VERIFICATION

The undersigned, John J. Spanos, being duly sworn, deposes and says he is the President of Gannett Fleming Valuation and Rate Consultants, LLC, 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.

John J. Spanos
John J. Spanos

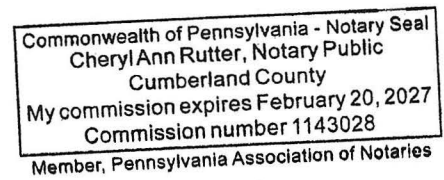
Commonwealth of Pennsylvania)
)
County of Cumberland) Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said
Commonwealth and County, by John J. Spanos, on January 23, 2026.

Notary Public


My Commission Expires February 20, 2027

Notary ID Number 1143028



VERIFICATION

The undersigned, Clinton M. Stutler, being duly sworn, deposes and says he is the Director of Natural Gas Procurement for American Electric Power Service Corporation, 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.

Signed by:

38A233F59EE548F...

Clinton M. Stutler

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Clinton M. Stutler, on _____.

Signed by:

E9B1BC7AC31F421...

Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
COMMONWEALTH OF KENTUCKY
Commission #KYNP71841
My Commission Expires 5/5/2027

VERIFICATION

The undersigned, Katharine I. Walsh, being duly sworn, deposes and says she is the Managing Director of Regulatory Pricing and Analysis for American Electric Power Service Corporation, that she 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 her information, knowledge, and belief.

Katharine I. Walsh

Katharine I. Walsh

Franklin County
Ohio)

Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Katharine I. Walsh, on January 23, 2026.

Hayden Capace

Notary Public

My Commission Expires Does Not Expire

Notary ID Number



HAYDEN CAPACE
NOTARY PUBLIC - OHIO

VERIFICATION

The undersigned, Cynthia G. Wiseman, being duly sworn, deposes and says she is the President and Chief Operating Officer for Kentucky Power Company, that she 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 her information, knowledge, and belief.

Cynthia G. Wiseman
Cynthia G. Wiseman

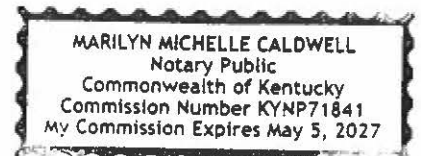
Commonwealth of Kentucky)
County of Boyd) Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County and State, by Cynthia G. Wiseman, on January 21, 2026

Marilyn Michelle Caldwell
Notary Public


My Commission Expires May 5, 2027

Notary ID Number KYNP71841



VERIFICATION

The undersigned, Tanner S. Wolfram, being duly sworn, deposes and says he is the Director of Regulatory Services 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.


Tanner S. Wolfram

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2025-00257

Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Tanner S. Wolfram, on January 22, 2026.

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

