

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026

**DATA REQUEST**

**KPSC  
PHDR 2\_1** Refer to Kentucky Power's December 31, 2025 supplemental response to Commission Staff's First Request for Information (Staff's First Request), Item 3, KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm. Provide an update to KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm with information through December 31, 2025.

**RESPONSE**

Please see KPCO\_R\_KPSC\_PHDR\_2\_1\_Attachment1 for the requested information.

Witness: Brian C. Ciborek

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 1 of 4

**DATA REQUEST**

**KPSC  
PHDR 2\_2**

Refer to Kentucky Power's response to Staff's First Request, Item 55, KPCO\_R\_KPSC\_1\_55\_Attachment27\_SpaethWP7.xlsx and the Direct Testimony of Michael M. Spaeth (Spaeth Direct Testimony), page 26.

a. Confirm that Kentucky Power's PJM LSE OATT Expense adjustment described on page 26 of the Spaeth Direct Testimony is based, in part, on Kentucky Power's 2025 revenue requirement for FERC transmission rates in the amount of \$107,521,697, as reflected in Cell O15 of Tab "Zonal Rates." If this cannot be confirmed, explain each basis why it cannot be confirmed, including providing the revenue requirement for Kentucky Power that is used, along with those of other AEP East companies, to calculate the FERC rate.

b. Confirm that Kentucky Power's 2024 revenue requirement for FERC transmission rates was less than Kentucky Power's 2025 revenue requirement for FERC transmission rates used, in part, to calculate Kentucky Power's PJM LSE OATT Expense adjustment, and if so, provide Kentucky Power's 2024 revenue requirement used to calculate FERC transmission rates. If this cannot be confirmed, explain each basis why it cannot be confirmed.

c. Confirm that the negative revenue reflected in Account 4561035 on Excel Line 9 of Tab "ADJ-Calc," including the adjustment in the amount of \$(4,409,387), and the negative revenue reflected in Account 4561060 on Excel Line 11, including the adjustment in the amount of \$(10,518), are intended to represent the extent to which Kentucky Power is responsible for paying its own FERC transmission revenue requirement, and the enhancement thereon. If this cannot be confirmed, explain each basis why it cannot be confirmed.

d. Identify each account and subaccount in which the positive revenue, as distinguished from the revenue offset, associated with Kentucky Power's revenue from FERC transmission rates is recorded, e.g. accounts 4561006, 4561007, 4561028, 4561029, 4561030, 4561033, 4561034, 4561045, 4561058, 4561059, 4561061, etc.

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 2 of 4

e. Explain each basis why it is reasonable and appropriate to adjust Kentucky Power's PJM LSE OATT Expense based, in part, on an assumption that Kentucky Power's FERC transmission revenue requirement will increase in 2025 without making all corresponding adjustments to Kentucky Power's other revenue to reflect that increase in revenue from FERC transmission rates. If Kentucky Power contends that it made all such adjustments to other revenue, identify each account and subaccount to which those adjustments were made and explain where and how those adjustments are reflected in the workpapers.

**RESPONSE**

Kentucky Power respectfully objects to this request on the grounds that it requires the introduction of new evidence into this proceeding after multiple rounds of discovery, a full evidentiary hearing, post-hearing data requests related to issues raised at the hearing, and multiple rounds of briefing. If the Commission intends to rely upon the evidence provided herein to modify or otherwise prevent the recovery of these FERC-approved expenses or any other aspects of the Application or Settlement Agreement, then Kentucky Power requests sufficient notice of the Commission's intention to do so and all other protections afforded to Kentucky Power under the Due Process Clause of the United States Constitution and Section 2 of the Kentucky Constitution. This includes but is not limited to the right to a hearing along with a list of topics to be discussed or evidence to be sought at that hearing so that Kentucky Power can sufficiently prepare and ensure proper witnesses are in attendance. Subject and without waving this objection, Kentucky Power states as follows:

a. Confirmed. Please also see the Company's response to subpart e for additional context.

b. The Company confirms that Kentucky Power's 2024 revenue requirement for FERC transmission rates was less than Kentucky Power's 2025 revenue requirement for FERC transmission rates. Please see KPCO\_R\_PHDR\_2\_5\_Attachment1 and KPCO\_R\_PHDR\_2\_5\_Attachment2 for the Company's calculations of the 2024 FERC revenue requirements and KPCO\_R\_PHDR\_2\_5\_Attachment3 and KPCO\_R\_PHDR\_2\_5\_Attachment4 for the Company's calculations of the 2025 FERC revenue requirement, which were relied upon to calculate the PJM LSE OATT expense adjustment in this case.

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 3 of 4

c. The referenced line 9 of the question refers to the NITS costs in the test year that were billed by PJM to Kentucky Power in its role as the LSE for its customers, the annualized amount under 2025 rates, and the difference (which is the adjustment to the test year). The referenced line 11 of the question refers to the Regional Transmission Expansion Plan costs in the test year that were billed by PJM to Kentucky Power in its role as the LSE for its customers, the annualized amount under 2025 rates, and the difference (which is the adjustment to 2025 rates).

d. Please see Section V Schedule 4, line 292 of the Company's Application. Additionally, the source detail in column "L" in the electronic version of Section V Schedule 4 includes all account numbers.

e. The Company has not made post-test year transmission investment adjustments to rate base and therefore has not made corresponding adjustments to Transmission Owner ("TO") revenue related to increased transmission investment. To be clear, any cost-of-service increase to TO revenue would require an increase to transmission rate base, depreciation expense, transmission O&M expense and depreciation expense, which have not been made in the Company's cost of service schedules in this proceeding.

There are three distinct items included in the Company's retail rates related to transmission service. Those items are:

1. The Company's embedded KY retail transmission cost of service
2. PJM transmission owner (TO) revenues
3. PJM LSE OATT charges

1.) The Company's embedded KY retail transmission cost of service is the return on and of the Company's owned transmission assets and the associated operating expenses (operation and maintenance expense, property taxes, administrative and general expenses, etc.). This cost of KY retail transmission service is included in the Company's base rates.

2.) The Company's PJM transmission owner revenues are the wholesale revenues paid to the Company by PJM based on their annual wholesale revenue requirement. The level of revenue is based on a formula rate cost of service that is approved by FERC. PJM TO revenues are reflected in the Company's base rates as a credit to the cost of service. The Company's PJM transmission owner revenues are based on the same transmission assets and expenses described in item number 1. Or said another way, item number 2 reflects the FERC approved rates compensating the Company for item number 1.

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 4 of 4

3.) The Company's PJM LSE OATT charges are the charges assessed to the Company's retail load for wholesale transmission service in the PJM regional transmission organization ("RTO"). The rates underlying these charges are set by FERC and the Company recovers their PJM LSE OATT charges in base rates.

Item number 3, the Company's PJM LSE OATT charges for their customers' use of the transmission system, is different and distinct from items 1 and 2. PJM LSE OATT charges are based on the zonal cost of PJM transmission service and include charges from many transmission owners in PJM per the PJM tariff. They are not based solely on the Company's owned transmission assets.

The Company has a long history of adjusting test year historical PJM LSE OATT expense to the current rates accepted and authorized by FERC. The Company has consistently used the same methodology to adjust the test year expense to a fixed, known, and measurable level of expense charged to Kentucky Power at the time of filing. (*See* Case No. 2017-00179, Case No. 2020-00174, and Case No. 2023-00159.) The Company's recovery of these expenses as calculated was recently upheld and confirmed by the Franklin Circuit Court in Case No. 24-CI-160 and Case No. 25-CI-310.

Witness: Michael M. Spaeth

Witness: Jaclyn N. Cost (subpart d)

Witness: Katharine I. Walsh

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 1 of 3

**DATA REQUEST**

**KPSC  
PHDR 2\_3**

Refer to Kentucky Power's response to Staff's First Request, Item 55, KPCO\_R\_KPSC\_1\_55\_Attachment63\_WPSection\_V\_Exhibit\_1.xlsx, Tab "Sch 4," Cell C298, reflecting \$97,701,231 in "Other Electric TO Revenues." Refer also to Kentucky Power's December 31, 2025 supplemental response to Staff's First Request, Item 3, KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm, Tab "FERC\_IS1."

- a. Confirm that the \$97,701,231 in "Other Electric TO Revenues" reflected in Tab "Sch 4" of KPCO\_R\_KPSC\_1\_55\_Attachment63\_WPSection\_V\_Exhibit\_1.xlsx represents the sum of the monthly amounts reflected in accounts 4561006, 4561007, 4561028, 4561029, 4561030, 4561033, 4561034, 4561045, 4561058, 4561059, and 4561061 from June 2024 through May 2025 as reflected in Tab "FERC\_IS1" of KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm. If this cannot be confirmed, explain each basis why it cannot be confirmed, including each account and subaccount that makes up the \$97,701,231.
- b. Confirm that the sum of accounts 4561006, 4561007, 4561028, 4561029, 4561030, 4561033, 4561034, 4561045, 4561058, 4561059, and 4561061 from December 2024 through November 2025 is \$106,189,132 based on the amounts reflected in Tab "FERC\_IS1" of KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm. If this cannot be confirmed, explain each basis why it cannot be confirmed.
- c. Provide the sum of accounts 4561006, 4561007, 4561028, 4561029, 4561030, 4561033, 4561034, 4561045, 4561058, 4561059, and 4561061 from January 2025 through December 2025.
- d. Explain each basis why the sum of accounts 4561006, 4561007, 4561028, 4561029, 4561030, 4561033, 4561034, 4561045, 4561058, 4561059, and 4561061 from January 2025 through December 2025 should not be used in the calculation of the revenue requirement for this case in place of the \$97,701,231 reflected on "Sch 4" given Kentucky Power's proposed adjustment to PJM LSE OATT Expense.

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 2 of 3

**RESPONSE**

Kentucky Power respectfully objects to this request on the grounds that it requires the introduction of new evidence into this proceeding after multiple rounds of discovery, a full evidentiary hearing, post-hearing data requests related to issues raised at the hearing, and multiple rounds of briefing. If the Commission intends to rely upon the evidence provided herein to modify or otherwise prevent the recovery of these FERC-approved expenses or any other aspects of the Application or Settlement Agreement, then Kentucky Power requests sufficient notice of the Commission's intention to do so and all other protections afforded to Kentucky Power under the Due Process Clause of the United States Constitution and Section 2 of the Kentucky Constitution. This includes but is not limited to the right to a hearing along with a list of topics to be discussed or evidence to be sought at that hearing so that Kentucky Power can sufficiently prepare and ensure proper witnesses are in attendance. Subject to and without waiving these objections, Kentucky Power states as follows:

a. Confirmed.

b. Confirmed.

c. \$107,651,307.

d. The Company followed the Commission's regulations in calculating the revenue requirement when it filed its Application in August 2025. As such, the Company appropriately used a historical test year based on the 12 months' ended May 31, 2025, to calculate its revenue requirement, consistent with 807 KAR 5:001, Section 16(1)(a)(1), and made pro forma adjustments for known and measurable changes consistent with 807 KAR 5:001, Section 16(5). Please see the Company's response to KPSC\_PHDR 2-2(e) for an explanation as to why the calculation of the revenue requirement in this case properly did not use the transmission revenues for January 2025 through December 2025 as reflected on "Sch 4." No party has challenged or provided evidence disputing the methodology used in this proceeding with respect to these expenses.

Moreover, the Settlement Agreement in this case includes the expenses and adjustments as calculated and discussed in these responses. The Company reiterates that each aspect of the Settlement Agreement was carefully constructed to balance customer rate impacts and the Company's financial condition. To the extent the Settlement Agreement is modified to further reduce the revenue requirement therein, or otherwise materially modified, then the Company will likely need to withdraw from the Settlement Agreement.

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 3 of 3

Witness: Brian C. Ciborek (subparts a-c)

Witness: Michael M. Spaeth (subpart d)

Witness: Tanner S. Wolfram

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 1 of 3

**DATA REQUEST**

**KPSC  
PHDR 2\_4** Refer to Kentucky Power's response to Staff's First Request, Item 55, KPCO\_R\_KPSC\_1\_55\_Attachment27\_SpaethWP7.xlsx, Tab "ADJ-Calc" in which Kentucky Power calculated the PJM LSE OATT Expense adjustment based on changes it projected from test year amounts for accounts 4561005, 4561035, 4561060, 5650012, 5650016, 5650019, and 5650021. Refer also to Kentucky Power's December 31, 2025 supplemental response to Commission Staff's First Request for Information, Item 3, KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm, Tab "FERC\_IS1."

a. Confirm that the amounts recorded in accounts 4561005, 4561035, and 4561060 from December 2024 through November 2025 total \$2,551,245, \$(58,015,902) and \$(1,090,786), respectively, based on the amounts reflected in Tab "FERC\_IS1" of KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm. If this cannot be confirmed, explain each basis why it cannot be confirmed.

b. Confirm that the amounts recorded in accounts 5650012, 5650016, 5650019, and 5650021 from December 2024 through November 2025 total \$2,010,738, \$76,365,731, \$4,845,639, and \$1,093,172, respectively, based on the amounts reflected in Tab "FERC\_IS1" of KPCO\_SR\_KPSC\_1\_3\_2025-12-31\_SupplementalAttachment1.xlsm. If this cannot be confirmed, explain each basis why it cannot be confirmed.

c. Separately for each account, provide the total amounts recorded to accounts 4561005, 4561035, 4561060, 5650012, 5650016, 5650019, and 5650021 from January 2025 through December 2025.

d. Explain each basis why the amounts reflected in accounts 4561005, 4561035, 4561060, 5650012, 5650016, 5650019, and 5650021 from January 2025 through December 2025 should not be used to calculate the adjustments to those accounts when setting the revenue requirement (if Kentucky Power contends that the amounts for December 2025 are not available for any such account, explain why the December 2024 through November 2025 amounts should not be used).

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 2 of 3

**RESPONSE**

Kentucky Power respectfully objects to this request on the grounds that it requires the introduction of new evidence into this proceeding after multiple rounds of discovery, a full evidentiary hearing, post-hearing data requests related to issues raised at the hearing, and multiple rounds of briefing. If the Commission intends to rely upon the evidence provided herein to modify or otherwise prevent the recovery of these FERC-approved expenses or any other aspects of the Application or Settlement Agreement, then Kentucky Power requests sufficient notice of the Commission's intention to do so and all other protections afforded to Kentucky Power under the Due Process Clause of the United States Constitution and Section 2 of the Kentucky Constitution. This includes but is not limited to the right to a hearing along with a list of topics to be discussed or evidence to be sought at that hearing so that Kentucky Power can sufficiently prepare and ensure proper witnesses are in attendance. Subject to and without waiving these objections, Kentucky Power states as follows:

a. Confirmed.

b. Confirmed.

c.

Account	Jan - Dec 2025
4561005	2,582,262
4561035	(57,784,534)
4561036	(97,057)
4561060	(1,072,831)
5650012	2,019,950
5650016	76,544,270
5650019	4,786,634
5650021	1,105,429
5650015	166,086

d. Please see the Company's response to KPSC PHDR 2-3(d).

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026  
Page 3 of 3

The Company followed the Commission's regulations in calculating the revenue requirement when it filed its Application in August 2025. As such, the Company appropriately used a historical test year based on the 12 months' ended May 31, 2025, to calculate its revenue requirement, consistent with 807 KAR 5:001, Section 16(1)(a)(1), and made pro forma adjustments for known and measurable changes consistent with 807 KAR 5:001, Section 16(5). That historical test-year is used as the basis to set *prospective* rates. By the time a final order is issued in this proceeding, there are any number of changes to the Company's historical cost of service, almost all of which are not subject to true-up during this proceeding. For example, because rates will be effective in 2026, the Company necessarily will incur expenses based on the update for 2026 FERC transmission rates. This is the nature of a historical test-year that is provided for under 807 KAR 5:001, Section 16, such that it would be improper to adjust a single expense item to reflect updated actuals (albeit already out of date as the 2026 FERC transmission rates are now in effect) at the exclusion of other expense or revenue items that may have also changed during the course of the pending proceeding.

Moreover, as stated in the Company's response to KPSC PHDR 2-2(e), the Company has consistently used the same methodology to adjust the test year expense to a fixed, known, and measurable level of expense charged to Kentucky Power at the time of filing since its 2017 rate case. No party has challenged or provided evidence disputing the methodology used in this proceeding. The Company's PJM LSE OATT adjustment, which has been approved in past instances by the Commission and recently upheld by the Franklin Circuit Court, is a reasonable basis for setting prospective rates based on the Commission's regulations and the information available to the Company at the time it filed its Application in August 2025, and should not be modified in this instance.

Additionally, the Settlement Agreement submitted in this proceeding included the Company's PJM LSE OATT Adjustment (W16). The Company reiterates that each aspect of the Settlement Agreement was carefully constructed to balance customer rate impacts and the Company's financial condition. To the extent the Settlement Agreement is modified to further reduce the revenue requirement therein, or otherwise materially modified, then the Company will likely need to withdraw from the Settlement Agreement.

Witness: Michael M. Spaeth

Witness: Tanner S. Wolfram

Kentucky Power Company  
KPSC Case No. 2025-00257  
Commission Staff's Second Post-Hearing Data Requests  
Dated February 6, 2026

**DATA REQUEST**

**KPSC  
PHDR 2\_5** Provide the workpapers filed with FERC supporting Kentucky Power's 2024 and 2025 transmission revenue requirement, e.g. the Excel sheets supporting the calculation of the \$107,521,697 amount for 2025 and the corresponding amount for 2024.

**RESPONSE**

Kentucky Power respectfully objects to this request on the grounds that it requires the introduction of new evidence into this proceeding after multiple rounds of discovery, a full evidentiary hearing, post-hearing data requests related to issues raised at the hearing, and multiple rounds of briefing. If the Commission intends to rely upon the evidence provided herein to modify or otherwise prevent the recovery of these FERC-approved expenses or any other aspects of the Application or Settlement Agreement, then Kentucky Power requests sufficient notice of the Commission's intention to do so and all other protections afforded to Kentucky Power under the Due Process Clause of the United States Constitution and Section 2 of the Kentucky Constitution. This includes but is not limited to the right to a hearing along with a list of topics to be discussed or evidence to be sought at that hearing so that Kentucky Power can sufficiently prepare and ensure proper witnesses are in attendance. Subject to and without waiving these objections, Kentucky Power states as follows:

Please see KPCO\_R\_KPSC\_PHDR\_2\_5\_Attachment1,  
KPCO\_R\_KPSC\_PHDR\_2\_5\_Attachment2,  
KPCO\_R\_KPSC\_PHDR\_2\_5\_Attachment3, and  
KPCO\_R\_KPSC\_PHDR\_2\_5\_Attachment4.

Witness: Michael M. Spaeth





**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.

Michael M. Spaeth

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 Michael M. Spaeth, on February 11, 2026.

Notary Public



BRETT E. SCHMIED, Attorney At Law  
NOTARY PUBLIC - STATE OF OHIO  
My commission has no expiration date  
Sec. 147.03 R.C.

My Commission Expires N/A

Notary ID Number \_\_\_\_\_

**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 February 12, 2026.

Hayden Capace  
Notary Public

My Commission Expires Does Not Expire

Notary ID Number \_\_\_\_\_



**HAYDEN CAPACE**  
**NOTARY PUBLIC - OHIO**

