

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application Of Kentucky Power Company	)	
For (1) A General Adjustment Of Its Rates For	)	
Electric Service; (2) Approval Of Tariffs And Riders;	)	Case No. 2025-00257
(3) Approval Of Certain Regulatory And Accounting	)	
Treatments; and (4) All Other Required Approvals	)	
And Relief	)	

Kentucky Power Company’s Motion For Extension of Time

Kentucky Power Company (“Kentucky Power” or “Company”) respectfully moves the Public Service Commission of Kentucky (“Commission”), pursuant its September 11, 2025 Order in this case, for a short extension of time through October 17, 2025 to file responses to certain data requests issued by Commission Staff on September 24, 2025, and issued by the Attorney General and Kentucky Industrial Utility Customers, Inc. (collectively “AG-KIUC”) on September 29, 2025.

Commission Staff issued its second set of data requests, consisting of 99 distinct requests (not including sub-parts), and AG-KIUC issued their first set of data requests, consisting of 100 distinct requests (not including sub-parts), upon Kentucky Power on September 24, 2025 and September 29, 2025, respectively. The September 11, 2025 procedural schedule in this case requires Kentucky Power to file its responses to data requests no later than October 9, 2025. Kentucky Power began working immediately to prepare responses to all 199 data requests, along with responses to another 159 data requests (not including sub-parts) from other parties who have not yet been granted intervention in this matter,¹ within that same time frame. Despite

¹ See Kentucky Power Company’s Notice Regarding Data Requests From Non-Parties (filed Oct. 9, 2025).

Kentucky Power's diligence and best efforts to prepare complete responses to each of the requests, Kentucky Power requires additional time to produce documents in response to Commission Staff data requests 2_29(b) and 2_93(c), as well as responses to three Commission Staff data requests 2_86, 2_87, and 2_88, and responses to AG-KIUC data requests 1_6 and 1_7. Kentucky Power requests a short extension of six additional business days, through October 17, 2025, in which to file the aforementioned responses and documents, but will file the remaining information as soon as is practicable before that time, if possible. Kentucky Power is timely filing all other responses to data requests and attachments thereto.

Commission Staff data request 2_29(b) requests a copy of the reservation contract that the Company entered into to reserve a turbine for a new 450MW CT. This contract is not limited to the contractual obligations of Kentucky Power, but rather also includes information related to other AEP affiliates, which requires a more detailed review. The contract is lengthy and detailed, and it contains, in part, highly commercially sensitive information related to Kentucky Power and its affiliate companies. Due to the extent of the contract and the risk associated with filing commercially sensitive material in the public record, the Company requires more time to adequately review the contract and redact any information that is not suitable for public filing. Although the contract is in the Company's possession, it has been unable to complete its review for such information due to the amount of outstanding data requests for multiple parties in this case and the short time frame with which to respond to them. The Company anticipates that it can complete its review for confidential information no later than October 17, 2025, but will provide the contract as soon as the review is complete if before that date.

Commission Staff data request 2_93(c) requests that the Company provide a class cost-of-service study utilizing the minimum-system method in place of the zero-intercept method.

This study requires substantial effort and additional time to develop and cannot reasonably be completed by the deadline for the Company's response to the data requests. The Company anticipates that it can provide the Commission with this study no later than October 17, 2025, but will provide it as soon as it is complete if before that date.

Commission Staff data requests 2_86, 2_87, and 2_88 and AG-KIUC data requests 1_6 and 1_7 all seek an abundance of detailed compensation and benefit information for the Company's executive, salaried, and non-salaried employees, as well as data concerning the Company's new and vacant positions. Compiling this information requires a significant amount of data to be identified, and analyzed by the Company in order to determine its responsiveness. Despite Kentucky Power's best efforts, it cannot reasonably respond fully to such data requests in the time period allotted and requires an extension of time to thoroughly and completely analyze, review, and respond to Commission Staff's and AG-KIUC's requests. The Company anticipates that it can perform such review and make such determinations by no later than October 17, 2025, but will respond sooner if possible.

WHEREFORE, Kentucky Power Company respectfully requests that the Commission enter an Order:

1. Granting Kentucky Power a short extension of time through October 17, 2025 to file documents that are responsive to Commission Staff data requests 2_29(b) and 2_93(c), and to file responses to Commission Staff data requests 2_86, 2_87, and 2_88, and AG-KIUC data requests 1_6 and 1_7; and
2. Granting such further relief to which the Company may be entitled.

Respectfully submitted,



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