

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Electronic Application Of Kentucky Power Company    )  
For (1) A General Adjustment Of Its Rates For            )  
Electric Service; (2) Approval Of Tariffs And Riders;    )  
(3) Approval Of Certain Regulatory And Accounting       )  
Treatments; and (4) All Other Required Approvals       )  
And Relief    )

Case No. 2025-00257

**REBUTTAL TESTIMONY OF**  
  
**BRIAN C. CIBOREK**  
  
**ON BEHALF OF KENTUCKY POWER COMPANY**

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**TABLE OF CONTENTS**

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
I. INTRODUCTION .....	1
II. PURPOSE OF REBUTTAL TESTIMONY .....	1
III. RATE BASE TREATMENT OF ACCOUNTS PAYABLE IN FUEL INVENTORY AND NON-FUEL MATERIALS AND SUPPLIES .....	2
IV. CONCLUSION.....	3

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**I. INTRODUCTION**

1   **Q.   PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND PRESENT**  
2       **POSITION.**

3   A.   My name is Brian C. Ciborek. My business address is 1 Riverside Plaza, Columbus,  
4       Ohio 43215. I am employed by the American Electric Power Service Corporation  
5       (“AEPSC”) as a Senior Manager in Regulatory Accounting Services. AEPSC is a  
6       wholly-owned subsidiary of American Electric Power Company, Inc. (“AEP”). AEP  
7       is the parent company of Kentucky Power Company (“Kentucky Power” or the  
8       “Company”).

9   **Q.   ARE YOU THE SAME BRIAN C. CIBOREK WHO OFFERED DIRECT**  
10       **TESTIMONY IN THIS PROCEEDING?**

11   A.   Yes.

**II. PURPOSE OF REBUTTAL TESTIMONY**

12   **Q.   WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

13   A.   The purpose of my Rebuttal Testimony is to respond to the following proposed  
14       adjustment presented in the Direct Testimony of Attorney General of the  
15       Commonwealth of Kentucky and Kentucky Industrial Utility Customers, Inc. (“AG-  
16       KIUC”) Witness Lane Kollen:

- 1 1. Adjustments to subtract accounts payable in fuel inventory and non-fuel  
2 materials and supplies (M&S) from rate base.

3 **Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.**

4 A. The Company disagrees with Mr. Kollen's recommendations to subtract accounts  
5 payable in fuel inventory and M&S from rate base. Due to the short-term nature of  
6 accounts payable financing, it is reasonable to expect that accounts payable balances  
7 as of the historical test year end will be paid, and therefore wholly financed, by the  
8 Company by the time rates resulting from this case are implemented.

**III. RATE BASE TREATMENT OF ACCOUNTS PAYABLE IN FUEL  
INVENTORY AND NON-FUEL MATERIALS AND SUPPLIES**

9 **Q. PLEASE EXPLAIN MR. KOLLEN'S PROPOSALS REGARDING RATE BASE**  
10 **TREATMENT OF ACCOUNTS PAYABLE IN FUEL INVENTORY AND M&S.**

11 A. Mr. Kollen is recommending that May 31, 2025 test year end fuel inventory and M&S  
12 balances included in rate base be reduced by the 13-month average of related accounts  
13 payable outstanding, because accounts payable vendors finance the accounts payable  
14 balances until paid by the Company. Mr. Kollen cites the Commission order in  
15 Kentucky Power's last base case<sup>1</sup>, as well as orders in recent Duke Energy Kentucky<sup>2</sup>  
16 and Atmos<sup>3</sup> base rate proceedings, as further support for his recommendation.

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<sup>1</sup> Case No. 2023-00159

<sup>2</sup> Case Nos. 2021-00190, 2022-00372 and 2024-00354

<sup>3</sup> Case No. 2024-00276

1    **Q.     DOES THE COMPANY AGREE WITH MR. KOLLEN’S PROPOSAL?**

2    A.     No. Accounts payable are short-term in nature (due within a couple of months from  
3           accrual). Therefore, it is reasonable to expect that accrued accounts payable in fuel and  
4           prepayments as of the May 31, 2025 test year end in this case would be paid by the  
5           Company, and therefore financed at the Company’s weighted average cost of capital,  
6           by the time new rates resulting from this case are implemented in 2026. The Company  
7           respectfully requests that Mr. Kollen’s recommendation be rejected.

**IV. CONCLUSION**

8    **Q.     DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

9    A.     Yes, it does.

## VERIFICATION

The undersigned, Brian C. Ciborek, being duly sworn, deposes and says he is the Accounting Senior Manager 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.

Signed by:

*Brian C. Ciborek*

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Brian C. Ciborek

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 Brian C. Ciborek, on 12/15/2025 | 11:52 AM EST.

Signed by:

*Michelle Caldwell*

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Notary Public

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

My Commission Expires 05/05/2027

Notary ID Number KYNP71841