

**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)	

Motion for Clarification

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to 807 KAR 5:001, Section 5 for clarification of its February 28, 2026 order (“Order”) in this proceeding. Specifically, the Company seeks clarification regarding the rates identified in Appendix B to the Order. The rates identified in Appendix B would not allow the Company to recover the revenue requirement authorized in the Order. The Company seeks clarification regarding the calculation of the rates identified in Appendix B so that it may promptly and correctly implement rates sufficient to recover the revenue requirement authorized in the Order.¹

I. Items Requiring Clarification

The Order authorized Kentucky Power to charge rates that result in an increase in annual revenue of \$55.13 million. Based on the Company’s review, the rates identified in Appendix B to the Order, however, do not appear to allow the Company to recover that amount. It appears that the under-recovery is largely because of the rates identified for the Industrial General Service Tariff (“I.G.S. Tariff”) in Appendix B to the Order. Notably, the per-kWh rates for Tariff I.G.S. should decrease as the voltage increases in the following order: Secondary > Primary >

¹ By filing this motion for clarification, Kentucky Power is not waiving and expressly reserves its right to file a motion seeking rehearing under KRS 278.400 or an action to vacate or set aside the Order under KRS 278.410.

Subtransmission > Transmission. Instead, the rates identified in Appendix B show that the per-kWh rate for Subtransmission service is lower than that for Transmission service. The rate for Subtransmission service is lower than the base fuel rate and results in a negative Energy Charge per kWh for base rates after accounting for base fuel. The Company seeks clarification regarding the basis for establishing the per-kWh rates for Tariff I.G.S. as shown on Appendix B to the Order.

The revenue shortfall may also be attributable, in part, to the rates for certain customer classes remaining unchanged from current rates. Specifically, Appendix B does not contain any rates for the following customer classes and services:

- Residential Time of Day 2 (027)
- Residential Demand Metered Tariff (018)
- Large General Service TOD – Subtransmission (258)
- Large General Service TOD – Transmission (259)
- Outdoor Lighting – Flex Lighting Charges
- Street Lighting – Flex Lighting Charges
- Alternative Feed Service

However, Appendix B contains the statement that “[a]ll other rates and charges not specifically mentioned herein shall remain the same as those in effect under the authority of this Commission prior to the effective date of this Order.” Accordingly, the Company seeks clarification as to whether the above identified rates are to remain unchanged from its current rates for those services.

Appendix B also does not identify the reconnection rate for customers with AMI meters once installed. The Company proposed to set the charge for reconnecting AMI meters at \$0 because there will be no need to send Company personnel to a residence to reconnect an AMI meter. If the Commission intended to not set a separate rate for reconnecting AMI meters, the cost to reconnect an AMI meter will be as set in Appendix B despite the fact the Company incurs no

costs to reconnect the meter. The Company, therefore, seeks clarification that the Company's proposed \$0 rate for reconnecting customer with AMI meters is approved.

Finally, the Company seeks clarification of two more items in Appendix B. First, the Company seeks clarification as to whether the Demand Charge for General Service customers taking Subtransmission service (under tariff code 236) should be \$8.14 per kW instead of \$8.14 per kWh. Utilizing a per kW rate for the Demand Charge is consistent with the Company's current rate schedule, but Appendix B currently lists the Demand Charge as a per kWh charge. Second, the Company seeks clarification regarding the Commission's intent regarding the Energy Charge for tariff code 260. Tariff Code 260 is listed twice in Appendix B, once with the other tariff codes for the Company's Large General Service ("L.G.S.") customers taking Secondary service² and once by itself. The Energy Charge identified for tariff code 260 in each location is different. Kentucky Power requests clarification regarding whether the Commission intended for the Energy Charge for tariff code 260 to differ from the other Secondary service tariff codes under Tariff L.G.S.

II. Clarification is Necessary.

Kentucky Power respectfully requests that the Commission confirm or clarify the rates referenced above so that Company may fully evaluate whether the rates proposed by the Commission are sufficient to provide the revenue requirement that the Commission authorized in the Order and that the Company may update the rates charged to customers with the correct rates. The Company respectfully requests that clarification be granted promptly to allow the Company to make the necessary adjustments to its tariff sheets in accordance with the timing set in the Order.

² The Company notes that in the current tariff, the rates for tariff code 260 are listed with and are the same as the rates for the other L.G.S. customers taking Secondary service (tariff codes 240 and 242). Similarly, the rates for tariff code 264 is listed with and are the same as the rates for the other L.G.S. customers taking Primary service (tariff codes 244 and 246).

III. Conclusion.

For the reasons stated above, Kentucky Power Company respectfully requests that the Commission enter an order:

- (1) Clarifying the rates included in Appendix B to its February 28, 2026 Order as described in this motion; and
- (2) Granting the Company all other relief to which it may be entitled.

Respectfully submitted,



Katie M. Glass
STITES & HARBISON PLLC
400 W Market Street
Suite 1800
Louisville, Kentucky 40202-3352
Telephone: (502) 587-3400
Fax: (502) 587-6391
kglass@stites.com

Kenneth J. Gish, Jr.
Harlee P. Havens
STITES & HARBISON PLLC
250 West Main Street, Suite 2300
Lexington, Kentucky 40507-1758
Telephone: (859) 226-2300
Fax: (859) 253-9144
kgish@stites.com
hhavens@stites.com
COUNSEL FOR KENTUCKY POWER
COMPANY