

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)	Case No. 2025-00257
And Riders; (3) Approval Of Certain Regulatory)	
and Accounting Treatments; And (4) All Other)	
Required Approvals And Relief)	
)	

MOTION TO INTERVENE OF SWVA KENTUCKY, LLC

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), SWVA Kentucky, LLC (“SWVA”) respectfully requests that the Kentucky Public Service Commission (the “Commission”) permit it to intervene in the above-captioned proceeding and states in support thereof as follows:

1. On August 29, 2025, Kentucky Power Company (“Kentucky Power” or the “Company”) filed an Application for (1) approval of a general adjustment of its electric rates; (2) approval of its tariffs and riders; (3) approval of certain regulatory and accounting treatments; and (4) all other required approvals and relief.
2. On September 11, 2025, the Commission issued an order setting the procedural schedule in the above captioned case.
3. Under KAR 5:001, Section 4(11)(b), there are two bases upon which the Commission may grant intervention. The first basis is “that he or she has a special interest in the case that is not otherwise adequately represented”; alternatively, the second basis is “that his or her intervention is likely to present issues or to develop facts that assist the Commission in

fully considering the matter without unduly complicating or disrupting the proceedings.”

SWVA asserts that it meets both bases upon which intervention may be granted.

4. Further, KRS 278.040(2) requires that a person seeking intervention must have an interest in the rates or service of a utility, as those are the only matters that are subject to the Commission’s jurisdiction.
5. SWVA owns a steel production facility located at 2704 South Big Run Road West, Ashland, Kentucky.
6. SWVA purchased the facility after the previous owner permanently closed it on financial grounds.
7. SWVA’s goals are to grow its business in Ashland and to preserve and add high-quality manufacturing jobs there.
8. As evidenced by the shuttering of steel manufacturing operations in Kentucky, the global steel manufacturing industry is highly competitive.
9. SWVA purchases large quantities of electricity from Kentucky Power.
10. In a globally competitive industry that is energy intensive, electric power rates are important to the viability of business operations.
11. In light of the significant amounts of electricity that SWVA purchases from Kentucky Power, the significance of the cost of electricity to sustainable steel manufacturing operations and SWVA’s goals for the facility, changes to Kentucky Power’s rates may substantially impact SWVA’s operational goals.
12. SWVA takes service from Kentucky Power under Tariff C.S.-I.R.P. at transmission voltage. Under Tariff C.S.-I.R.P., the Company offers the customer a credit (discount) in exchange for the customer’s commitment to curtail or interrupt its load, which in turn helps

the Company meet its PJM obligations. Additionally, to take service under C.S.-I.R.P, the customer is required to execute a written addendum setting forth the terms of service and basis for customer interruptions. SWVA's executed addendum is on file with the Commission.¹

13. To the best of SWVA's knowledge, no other party to this proceeding takes service under the Company's interruptible tariffs. As such, SWVA has a special interest in Kentucky Power's industrial and interruptible service offerings.

14. Given the aforementioned facts, SWVA has a special interest that is not adequately represented by another party. For the foregoing reasons, no party to this proceeding appears to represent customers/loads such as SWVA in this case. At a minimum, SWVA appears to have a special interest in interruptible discounts/rates that is not otherwise adequately represented in this case.²

15. If this Commission grants SWVA's Motion, SWVA intends to issue discovery requests regarding the application. SWVA will also consider filing testimony and/or briefs, and participating in the evidentiary hearing.

16. SWVA's participation will likely assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.

17. The Kentucky attorneys representing SWVA in this case and to receive service of all documents are:

¹ Addendum 1, Special Terms and Conditions, between Kentucky Power Company and SWVA Kentucky, LLC, [https://psc.ky.gov/tariffs/electric/kentucky power company/contracts/swva kentucky, llc/2020-02-06 _Addendum to Interruptible Service Contract.pdf](https://psc.ky.gov/tariffs/electric/kentucky%20power%20company/contracts/swva%20kentucky,%20llc/2020-02-06_Addendum%20to%20Interruptible%20Service%20Contract.pdf).

² SWVA participated in and was a party to Kentucky Power's last two general rate cases, Case Nos. 2020-00174 and 2023-00159.

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WHEREFORE, SWVA respectfully requests that it be granted full intervenor status and be made party to the above-captioned proceeding.

Respectfully submitted,

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Local Counsel for SWVA Kentucky, LLC

Dated: September 17, 2025

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Orders in Case No. 2020-00085, and in accord with all other applicable law, an electronic copy of the foregoing was served and filed by electronic mail to the following parties of record this 17th day of September, 2025.

By: /s/ W. Mitchell Hall, Jr.

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