COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| Electronic Application Of Kentucky Power Company |) | |
|---|---|---------------------|
| For An Order Approving Accounting Practices To |) | |
| Establish A Regulatory Asset Related To The |) | Case No. 2025-00291 |
| Extraordinary Expenses Incurred By Kentucky Power |) | |
| Company In Connection With Several Severe Storms |) | |
| From February Through May 2025 |) | |

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") for a one-day extension of time through October 1, 2025, to file responses to Commission Staff's September 22, 2025 data requests.

Kentucky Power's responses to Commission Staff's September 22, 2025 data requests must be filed no later than September 30, 2025. In addition to this case, Kentucky Power also filed an application for approval to establish a regulatory asset for extraordinary storm costs resulting from the May 2025 Major Event Storms in Case No. 2025-00264. The Commission issued its first set of data requests to Kentucky Power in that case on September 12, 2025, responses to which must be filed no later than October 1, 2025. Some of the data requests issued by Commission Staff in this proceeding are identical or similar to those issued in Case No. 2025-00264. Moreover, Kentucky Power requested an informal conference in this case and in Case No. 2025-00264 to be set for September 30, 2025. That request remains pending. Finally, Kentucky Power's informal technical conference in its currently-pending rate case, Case No. 2025-00257, is scheduled for September 30, 2025.

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¹ See Staff data request 1-3, 1-5, 1-6, 1-7, and 1-8.

Kentucky Power requests a short extension of one additional day, through October 1, 2025, to file responses to Commission Staff's September 22, 2025 data requests. Good cause exists for the Commission to grant the requested short extension of time. First, nearly the entirety of Kentucky Power's regulatory staff will be travelling to and attending the informal technical conference in Case No. 2025-00257 (and the informal conference requested in this case, if granted) on September 30, 2025. Thus, responses to these data requests would likely need to be filed prior to September 30, 2025, giving Kentucky Power only five business days to respond to the data requests during a time when Kentucky Power will also be preparing for the rate case informal technical conference. Further, if the Commission grants Kentucky Power's request and schedules an informal conference in this matter and Case No. 2025-00264 on September 30, 2025, Kentucky Power and the Commission would benefit from an extra day to incorporate into its responses any modifications that may be prudent after the conference. Finally, considering that several of the data requests in this case are substantially similar to, or exactly the same as, certain data requests issued in Case No. 2025-00264 that are due October 1, 2025, an extension of time to make those due dates commensurate would be appropriate.

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

- 1. Granting Kentucky Power a short extension of time through October 1, 2025 to file responses to Commission Staff's September 22, 2025 data requests as described herein; and
 - 2. Granting such further relief to which the Company may be entitled.

Respectfully submitted,

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