

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

In the Matter of:

The Electronic Application Of Kentucky Power)
Company For A Certificate Of Public Convenience)
And Necessity To Construct 46kV Transmission Line)
In Floyd and Johnson Counties, Kentucky)
("Prestonsburg – Thelma Transmission Line Rebuild)
Project"))

Case No. 2025-00346

**DIRECT TESTIMONY OF

TANNER S. WOLFFRAM

ON BEHALF OF KENTUCKY POWER COMPANY**

**DIRECT TESTIMONY OF
TANNER S. WOLFFRAM ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2025-00346

TESTIMONY INDEX

<u>SECTION</u>	<u>PAGE</u>
I. INTRODUCTION	1
II. BACKGROUND.....	1
III. PURPOSE OF TESTIMONY	3
IV. THE PROJECT OVERVIEW	4
V. CENTERLINE AND ROW	5
VI. CONSTRUCTION SCHEDULE.....	9
VII. NOTICES	10
VIII. FINANCIAL ASPECTS OF THE PROJECT	10

**DIRECT TESTIMONY OF
TANNER S. WOLFFRAM ON BEHALF OF
KENTUCKY POWER COMPANY
BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY**

CASE NO. 2025-00346

I. INTRODUCTION

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

2 A. My name is Tanner S. Wolfram, and I am the Director of Regulatory Services for
3 Kentucky Power Company (“Kentucky Power” or the “Company”). My business
4 address is 1645 Winchester Avenue, Ashland, Kentucky 41101.

II. BACKGROUND

5 **Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL**
6 **BACKGROUND.**

7 A. I received a Bachelor of Arts degree in Political Science from Miami University in
8 Oxford, Ohio in 2015 and my Juris Doctor degree from The Ohio State University
9 in Columbus, Ohio in 2018. I began my utility industry career with American Electric
10 Power Service Corporation (“AEPSC”) in September 2018 as a Legal Fellow, where I
11 worked on a variety of matters across AEP’s various jurisdictions. In September 2019,
12 I was hired as Counsel- Regulatory East, where I was responsible for providing legal
13 support and guidance on various complaint proceedings, fuel cost recovery,
14 tracker/rider, and base rate filings in AEP’s East jurisdictions, primarily for Kentucky
15 Power Company, Indiana Michigan Power Company, and Ohio Power Company. In
16 June 2021, I transferred to AEPSC’s central regulatory function as a Regulatory Case
17 Manager, where I coordinated state regulatory filings across AEP’s footprint. My

1 primary responsibilities were related to filings made in Kentucky, Ohio, and Indiana.
2 In July 2024, I accepted my current position as Director, Regulatory Services for
3 Kentucky Power.

4 **Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR OF REGULATORY**
5 **SERVICES FOR KENTUCKY POWER?**

6 A. I am responsible for managing the regulatory strategy for Kentucky Power. This
7 includes planning and executing rate filings for state regulatory agencies, as well as
8 filings for certificates of public convenience and necessity (“CPCN”) and for other
9 approvals before this Commission.

10 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN ANY REGULATORY**
11 **PROCEEDINGS?**

12 A. Yes. I adopted the Direct Testimony of Scott E. Bishop and submitted rebuttal
13 testimony in the Company’s currently pending Demand-Side Management proceeding,
14 Case No. 2024-00115. Additionally, I submitted written direct testimony in the
15 Company’s request for approval of a Renewable Energy Purchase Agreement for the
16 Bright Mountain Solar Facility, Case No. 2024-00243, and the Bellefonte Project
17 Application, Case No. 2024-00343, the Company’s currently pending application for a
18 CPCN to extend its interest in the energy and capacity from the Mitchell Plant, Case
19 No. 2025-00175, and the Company’s currently pending base rate case, Case No. 2025-
20 00257.

III. PURPOSE OF TESTIMONY

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

2 A. I am testifying in support of Kentucky Power’s application for a CPCN to build the
3 “Prestonsburg-Thelma Project” (the “Project”) located in Floyd and Johnson counties.
4 Specifically, I will:

- 5 • Provide an overview of the Project;
- 6 • Introduce the other witnesses supporting the Company’s Application;
- 7 • Provide an overview of the right-of-way (“ROW”) activities;
- 8 • Describe the stakeholder input process for the Project;
- 9 • Describe the notice provided to landowners for this proceeding; and
- 10 • Address the financial aspects of the Project.

11 **Q. WHAT WITNESSES WILL BE OFFERING TESTIMONY IN SUPPORT OF**
12 **KENTUCKY POWER’S APPLICATION?**

13 A. Three additional witnesses provide direct testimony in support of this Application.
14 First, Company Witness Jasmine L. Moore describes the need for the Project and scope
15 of work to be undertaken, identifies alternative electrical solutions that were evaluated
16 along with the proposed Project, and provides a summary of the Project’s advancement
17 through the PJM review process.

18 Second, Company Witness Scott Woody describes the transmission line
19 engineering aspects of the Project and right-of-way considerations.

20 Third, Company Witness Anastacia Santos sponsors the siting study and
21 provides details on the route selection process.

IV. THE PROJECT OVERVIEW

Q. PLEASE DESCRIBE THE PROJECT.

A. The Company proposes to retire the entire 16 miles of the 46kV Prestonsburg–Thelma circuit, build approximately 13 miles of new 46kV¹ Prestonsburg–Thelma circuit on mostly new right-of-way, replace the 138/69/46kV transformer at the Thelma Substation, and perform related station work at the Kenwood Substation (the “Prestonsburg-Thelma Project” or the “Project”). The Project is located in Floyd and Johnson counties and addresses baseline needs identified as part of the PJM Regional Transmission Expansion Plan (“RTEP”) process. The baseline solution includes:

- Replacing Thelma Transformer #1 with a 138/69/46kV 130/90 MVA transformer and replacing 46kV risers and relaying towards Kenwood Substation. The existing Transformer (“TR”) #1 is to be used as spare;
- Rebuilding approximately 13 miles of the Prestonsburg - Thelma 46kV circuit. This proposed line work will be designed to 69kV and operated at 46kV;
- Retiring Van Lear Switch, Jenny Wiley Switch, and Van Lear to Kenwood transmission line;
- Replacing the motor-operated air-breaker (“MOAB”) switches at the Company’s existing Kenwood Substation; and
- Relocating the existing 46kV capacitor bank within the station and install a high side circuit switcher on the distribution bank.

¹ This proposed line work to be rated at 69kV and operated at 46kV.

1 **Q. HAS THE PROJECT BEEN SUBMITTED TO PJM INTERCONNECTION**
2 **LLC (“PJM”)?**

3 A. Yes. PJM assigned the Project the Baseline IDs of B3360 and B3361. Further details
4 of the Project’s status before PJM are provided by Company Witness Moore.

5 **Q. WILL KENTUCKY POWER COMPANY CONSTRUCT AND OWN ALL OF**
6 **THE COMPONENTS OF THE PROPOSED PROJECT?**

7 A. Yes. This is in accordance with the Commission’s January 13, 2021 Order in Case No.
8 2020-00174 at pages 59-64.

9 **Q. WILL AEP KENTUCKY TRANSMISSION COMPANY, INC. CONSTRUCT,**
10 **OWN, OR OPERATE ANY OF THE PROJECT COMPONENTS?**

11 A. No.

V. CENTERLINE AND ROW

12 **Q. WHAT IS THE WIDTH OF THE PROPOSED ROW, GENERALLY, FOR THIS**
13 **PROJECT?**

14 A. Generally, the total ROW width for this Project is 100 feet total (or 50 feet on each side
15 of the transmission line).

16 **Q. KENTUCKY POWER FILED MAPS ILLUSTRATING THE PROPOSED**
17 **CENTERLINE OF THE TRANSMISSION LINE AND RIGHT OF WAY AS**
18 **EXHIBIT 4 (PROPOSED ROUTE MAPS) TO ITS APPLICATION. COULD**
19 **THAT CENTERLINE CHANGE?**

20 A. Yes. Constructability issues, access requirements, and conditions that are not evident
21 until final engineering, or that arise as a result of landowner negotiations, may result in
22 Kentucky Power being required to place the identified centerline and adjacent ROW

1 outside the ROW indicated on **EXHIBIT 4** (the “Proposed Route Maps”). Consistent
2 with the guidance provided by the Commission’s April 13, 2022 Order in Case No.
3 2021-00346, its September 22, 2022 Order in Case No. 2022-00118, and its October
4 6, 2023 Order in Case No. 2023-00040, the Company seeks authority to relocate the
5 centerline and associated ROW up to 100 feet in any direction (or 200 feet total) from
6 the location as shown on the maps filed with the Application if required to address
7 these conditions or issues.

8 The Company proposes to file a motion in this proceeding to request approval,
9 if needed, to move the centerline more than 100 feet in any direction from the
10 centerline, or more than the additional clearances requested for the specific spans
11 identified above, as it appears on the maps filed into the record in this proceeding. The
12 motion will identify the proposed new location of the centerline, the affected
13 landowner(s), and state in detail, and with technical specificity, the need for the
14 proposed modification of the centerline. Kentucky Power will serve the motion for
15 approval to move the centerline on any affected landowner(s), even if not a party to
16 this proceeding. The Company respectfully requests that upon receiving adequate
17 information to consider the request, the Commission use its best efforts to rule upon
18 such motions within 14 days.

19 This procedure is consistent with the Commission’s previous approvals in Case
20 Nos. 2021-00346 (Garrett Area Improvements 138 kV Transmission Project), 2022-
21 00118 (Wooton-Stinnett 161kV Transmission Rebuild Project), and 2023-00040
22 (Belfry Area Transmission Line Project). Specifically, in Case No. 2022-00118, the
23 Commission found that “Kentucky Power has identified sufficient need for the

flexibility to move the centerline and right-of-way up to 200 feet in either direction of the centerline as shown on the maps filed with the application. This request is reasonable in light of the nature of the terrain over which the proposed facilities will traverse, and the need for flexibility in response to landowner concerns.”²

Q. ARE THERE CERTAIN SPANS FOR WHICH THE COMPANY ALREADY KNOWS IT WILL NEED ADDITIONAL ROW BEYOND 100 FEET TOTAL?

A. Yes. The Company requests authority as part of this Application to relocate the centerline and associated facilities beyond the 100-foot-wide area requested above for certain discreet spans listed below and described in greater detail in Company Witness Woody’s Direct Testimony:

- The span from Structure 1493-4 to Structure 1493-5 requires 250 feet;
- The span from Structure 1493-6 to Structure 1493-7 requires 230 feet;
- The span from Structure 1493-7 to Structure 1493-8 requires 250 feet;
- The span from Structure 1493-8 to Structure 1493-9 requires 120 feet;
- The span from Structure 1493-10 to Structure 1493-11 requires 130 feet;
- The span from Structure 1493-11 to Structure 1493-12 requires 130 feet;
- The span from Structure 1493-13 to Structure 1493-14 requires 270 feet;
- The span from Structure 1493-14 to Structure 1493-15 requires 230 feet;
- The span from Structure 1493-17 to Structure 1493-18 requires 170 feet;
- The span from Structure 1493-18 to Structure 1493-19 requires 250 feet;

² Order at 22, *In The Matter Of: Electronic Application Of Kentucky Power Company For A Certificate Of Public Convenience And Necessity To Rebuild The Wootton-Stinnett Portion Of The Hazard-Pineville 161 kV Line In Leslie County, Kentucky*, Case No. 2022-00118 (Ky. P.S.C. Sept. 22, 2022).

- The span from Structure 1493-20 to Structure 1493-21 requires 120 feet;
- The span from Structure 1493-21 to Structure 1493-22 requires 110 feet;
- The span from Structure 1493-23 to Structure 1493-24 requires 130 feet;
- The span from Structure 1494-4 to Structure 1494-5 requires 270 feet;
- The span from Structure 1494-6 to Structure 1494-7 requires 120 feet;
- The span from Structure 1494-7 to Structure 1494-8 requires 120 feet;
- The span from Structure 1494-9 to Structure 1494-10 requires 110 feet;
- The span from Structure 1494-11 to Structure 1494-12 requires 120 feet;
- The span from Structure 1494-14 to Structure 1494-15 requires 120 feet;
- The span from Structure 1494-15 to Structure 1494-16 requires 120 feet;
- The span from Structure 1494-16 to Structure 1494-17 requires 280 feet;
- The span from Structure 1494-17 to Structure 1494-18 requires 130 feet;
- The span from Structure 1494-18 to Structure 1494-19 requires 150 feet;
- The span from Structure 1494-19 to Structure 1494-20 requires 150 feet;
- The span from Structure 1494-21 to Structure 1494-22 requires 110 feet;
- The span from Structure 1494-22 to Structure 1494-23 requires 120 feet; and
- The span from Structure 1494-23 to Structure 1494-24 requires 130 feet.

Q. IS KENTUCKY POWER SEEKING UNLIMITED DISCRETION TO RELOCATE THE TRANSMISSION LINE AND ROW?

A. No. Kentucky Power is seeking authority to move the centerline and associated ROW only within the limits indicated above.

1 **Q. WERE OWNERS OF PROPERTY LOCATED WITHIN 200 FEET OF THE**
 2 **CENTERLINE PROVIDED MAILED NOTICE OF THE COMPANY’S**
 3 **APPLICATION?**

4 A. Yes, the Company provided notice to persons owning property crossed by or adjacent
 5 to the Proposed Route for the Project, including the expanded ROW described above.
 6 The full details of the Company’s efforts to engage all landowners within or adjacent
 7 to Proposed Route for the Project is further described in Company Witness Santos’s
 8 testimony as well as the Siting Study included as in EXHIBIT 7 to the Application.

9 **Q. WILL THE COMMISSION BE INFORMED OF THE FINAL LOCATION OF**
 10 **THE LINE AND ROW?**

11 A. Yes. Kentucky Power will file with the Commission a revised plan showing the final
 12 location of the proposed line, structures, and the proposed substations after
 13 construction is completed.

VI. CONSTRUCTION SCHEDULE

14 **Q. WHEN DOES KENTUCKY POWER PROPOSE TO BUILD THE**
 15 **TRANSMISSION LINE AND THE SUBSTATIONS IF THE CERTIFICATE IS**
 16 **GRANTED?**

17 A. The Company anticipates beginning construction during the second quarter of 2026.
 18 Work is anticipated to be complete by end of the fourth quarter of 2028. The planned
 19 in-service date sequence is as follows:

- 20 • 2nd Quarter 2026: Anticipated start of construction (dependent on receipt
- 21 of CPCN);
- 22 • 2nd Quarter 2028: Project placed in-service;

- 4th Quarter 2028: Construction Complete.

VII. NOTICES

Q. DID KENTUCKY POWER PROVIDE NOTICE TO ADJOINING LANDOWNERS WHOSE PROPERTY MIGHT BE AFFECTED BY THE PROJECT?

A. Yes. Company Witness Santos's testimony provides more detailed information on outreach efforts. At a high-level, the Company conducted an in-person open house on December 5, 2022, and two virtual open houses on September 6, 2024, and November 17, 2025, respectively, for the Project. The Company provided a mailing packet to landowners within a 1,000-foot corridor of the Project to notify them of the Project and the virtual open houses.

Q. WHEN WAS THE LANDOWNER NOTICE MAILED?

A. The landowner notice for the Proposed Route was mailed on November 17, 2025. The list of landowners within the proposed ROW and notification corridor to whom the notice was mailed, including a verification of mailing, is attached as **EXHIBIT 8** (Notice Mailed to Landowners and Verification) to the Application.

VIII. FINANCIAL ASPECTS OF THE PROJECT

Q. WHAT IS THE PROJECTED COST OF THE PROJECT?

A. The total detailed estimate of the Project cost is approximately \$71.2 million. That sum comprises: (a) approximately \$61.6 million for transmission line work including ROW acquisition; (b) approximately \$7.8 million for construction and upgrade of the substations and switch structure; (c) approximately \$0.5 million for station removals; and (d) approximately \$1.3 million for transmission line removals.

1 **Q. HOW WILL THE COST OF THIS PROJECT BE ALLOCATED TO**
2 **KENTUCKY POWER BY PJM?**

3 A. The costs of the Project will be allocated to the AEP East PJM zone. Based on its
4 current 12 CP allocation, Kentucky Power's share of the total Project cost will be
5 5.429%. The remainder of the costs will be recovered from other load serving entities.

6 **Q. DOES THE APPROXIMATELY \$71.2 MILLION COST ESTIMATE**
7 **DESCRIBED ABOVE AND SET OUT IN THE APPLICATION REPRESENT**
8 **A FIXED AND FINAL COST?**

9 A. No. The estimate represents the best engineering assessment of the costs as of the date
10 of this Application. The exact cost will not be known until the Project is complete.

11 **Q. HOW WILL THE PROJECT COST BE FUNDED?**

12 A. Kentucky Power anticipates funding the cost of the Project through its operating cash
13 flow and other internally generated funds.

14 **Q. WILL THE COST OF THE PROJECT MATERIALLY AFFECT THE**
15 **FINANCIAL CONDITION OF KENTUCKY POWER COMPANY?**

16 A. No. Kentucky Power's assets, net of regulatory assets and deferred charges, as of June
17 2025, totaled \$2.1 billion. The cost of the Project thus represents an increase of
18 approximately 3.3% percent in those assets. The Project will not require the issuance
19 of debt and will not affect the completion of any other capital project.

1 **Q. WHAT IS THE PROJECTED COST OF OPERATION FOR THE PROPOSED**
 2 **FACILITIES AFTER THEY ARE COMPLETED?**

3 A. Kentucky Power estimates the annual operating cost will be approximately \$20,500 for
 4 general maintenance and inspection. The projected additional annual ad valorem taxes
 5 resulting from the Project are expected to total approximately \$953,000.

6 **Q. WILL THE PROJECT AS PROPOSED RESULT IN WASTEFUL**
 7 **DUPLICATION?**

8 A. No. The Project will not duplicate any existing facilities in the area and will not result
 9 in an excess of capacity over need, or excess investment in relation to the productivity
 10 and efficiency to be gained. The Company considered all reasonable alternatives to the
 11 Project, and the Project represents the most reasonable, least-cost alternative.
 12 Company Witnesses Woody and Moore provide further explanation of the alternatives
 13 considered in their respective testimonies, which demonstrate that the proposed Project
 14 is the least cost, most reasonable solution to meet the need in the area, and that the
 15 proposed solution will not result in wasteful duplication.

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes, it does.

VERIFICATION

The undersigned, Tanner S. Wolfram, being duly sworn, deposes and says he is the Director of Regulatory for Kentucky Power Company, 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.


Tanner S. Wolfram

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2025-00346

Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Tanner S. Wolffram, on November 21, 2025

Marilyn Michelle Caldwell
Notary Public

My Commission Expires May 5, 2027

Notary ID Number KYNP71841

