

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY  
POWER COMPANY FOR (1) APPROVAL OF  
CONTINUATION OF ITS DEMAND-SIDE )  
MANAGEMENT PROGRAMS; (2) AUTHORITY TO )  
RECOVER COSTS AND NET LOST REVENUES, )  
AND TO RECEIVE INCENTIVES ASSOCIATED ) CASE NO. 2025-00365  
WITH THE IMPLEMENTATION OF ITS )  
DEMAND-SIDE MANAGEMENT PROGRAMS; (3) )  
ACCEPTANCE OF ITS ANNUAL DSM STATUS )  
REPORT; AND (4) ALL OTHER REQUIRED )  
APPROVAL AND RELIEF

**INITIAL REQUESTS FOR INFORMATION OF JOINT INTERVENORS  
APPALACHIAN CITIZENS' LAW CENTER AND MOUNTAIN  
ASSOCIATION TO KENTUCKY POWER COMPANY**

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Dated: January 21, 2026

## **DEFINITIONS**

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was but is no longer in the Company’s possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any

other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company", "Kentucky Power Company", or "KPCo", means Kentucky Power Company, their parents or subsidiaries, and/or any of its officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliated companies including member cooperatives.
12. "Joint Movants" means Joint Movants for Joint Intervention, Appalachian Citizens' Law Center and Mountain Association who have moved for the status of full intervention as joint intervenors in this matter.
13. Unless otherwise specified in each individual request the term "tariff" means the tariffs as filed in this matter by KPCo.
14. "Commission" or "PSC" means the Kentucky Public Service Commission, including its Commissioners, personnel, and offices.
15. "TEE" means "Targeted Energy Efficiency."
16. "HEIP" means "Home Energy Improvement Program."
17. "CESP" means "Commercial Energy Solutions Program."
18. "HVAC" means "Heating, Ventilation, and Air Conditioning."
19. "DSM" means "Demand-Side Management."
20. "AMI" means "Advanced Metering Infrastructure."

## **INSTRUCTIONS**

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Joint Movants. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts, or depositions are requested, each witness should respond individually to the information request.
7. Wherever the response to a request consists of a statement that the requested information is already available to Joint Intervenors, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and, to the extent possible, paragraph number(s) and/or chart/table/figure number(s).
8. If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any discovery request, please describe the basis for your claim of privilege in

sufficient detail so as to permit Joint Intervenors or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, please produce a “privilege log” that identifies the author, recipient, date, and subject matter of the documents or interrogatory answers for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Joint Intervenors or the Commission to evaluate the validity of such claims.

9. Whenever the documents responsive to a discovery request consist of modeling files (including inputs or output) and/or workpapers, the files and workpapers should be provided in machine-readable electronic format (e.g., Microsoft Excel), with all formulas and cell references intact.
10. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**SUPPLEMENTAL REQUESTS FOR INFORMATION OF JOINT  
INTERVENORS APPALACHIAN CITIZENS' LAW CENTER AND  
MOUNTAIN ASSOCIATION TO KENTUCKY POWER COMPANY**

Joint Intervenors hereby tender the following initial requests for information to the Company:

- 1.1. On page 4 of the Application, the Company indicated that it allocated \$15,000 for the Weatherization Readiness Fund.
  - a. Please provide the level of funds expended from January 1, 2025 through December 31, 2025.
  - b. Please provide the number of homes addressed in 2025 by this fund.
  - c. Please identify the measures that were covered by this fund.
- 1.2. For the TEE program's proposed 2026 budget, please detail the budget by cost category.
- 1.3. For the TEE program, please provide the average wait time between requesting an audit and receiving an audit.
- 1.4. For the TEE program, please answer the following requests:
  - a. Please describe the channels that customers can use to find out if they are eligible to be served by the TEE program.
  - b. To the extent known, please identify the approximate number of customers that contacted the Company regarding possible participation in the TEE program.
  - c. Does the Company or any implementing partner(s) maintain a waitlist of TEE-eligible customers to be served? Please explain why or why not.
  - d. Please provide the Company's estimate of the number of TEE-eligible customers in their service territory.
- 1.5. On page 5 of the Application, the Company proposed to roll over unused funds from 2025 to 2026 to increase the HEIP budget from \$664,681 to \$991,494.
  - a. Please explain how the Company plans to increase its participation to that level of investment in 2026.
  - b. Please detail the 2026 budget by cost category.
  - c. Please explain how the Company will communicate impacts to customers' expectations and vendor support in 2027 when the budget is lowered to \$619,716, as indicated on page 6 of the Company's application in Docket No. 2024-00115.

- d. Please explain how the Company will ramp down in 2026 to prepare for the decrease in 2027 budget.
- 1.6. On page 5 of the Application, the Company proposed to roll over unused funds from 2025 to 2026, increasing the CESP budget from \$710,011 to \$1,267,246.
  - a. Would the Company agree that the level of budget proposed for CESP in 2026 is higher than any annual CESP budget approved by the Commission in Docket No. 2024-00115?
  - b. Please explain how the Company believes it will be able to expend this level of funds based upon current known projects and applications.
  - c. Please detail the 2026 budget by cost category.
  - d. Please explain how the Company will communicate impacts to customers' expectations and vendor support in 2027 when the budget is lowered to \$686,862, as indicated in the Company's application in Docket No. 2024-00115.
  - e. Please explain how the Company will ramp down in 2026 to prepare for the decrease in 2027 budget.
- 1.7. Please explain why the Company is proposing to roll over the unspent 2025 budgets into only 2026, rather than ramp up the unspent funds throughout 2026 and 2027.
- 1.8. For each program, please provide the monthly forecasted spending, participation, and savings for 2026.
- 1.9. Regarding program support and vendors:
  - a. Please identify the number of vendors by program as of 2025.
  - b. Please provide the number of vendors the Company has brought into the program in 2025 or plans to bring into the program to support the level of forecasted participation in 2026.
- 1.10. Please detail all market factors the Company foresees impacting the program participation, either negatively or positively.
- 1.11. Please provide the level of confidence the Company has in achieving its 2026 projections and the reason for its confidence level. Please provide any supporting documentation.

1.12. Refer to the Direct Testimony of Stevi N. Cobern (Cobern Direct Testimony), page 5, lines 15-19.

- a. Please detail the activities that the Company completed by month for the roll out of
  - i. HEIP
  - ii. CESP
- b. Please detail when the Company began marketing each of its programs, the types of marketing, and the number of people that received marketing materials.
- c. Please detail whether the costs associated with the 2025 program roll out are those captured under the General costs for Residential and General Commercial. If not, please explain where these costs are captured.
- d. Please explain whether the Company will need to revise its marketing materials to reflect adjusted incentive levels based upon the Company's proposal.

1.13. Refer to Cobern Direct Testimony, page 6, lines 12-18.

- a. Please explain whether the rebates are available for online submission or must be mailed in. Additionally, explain whether the participating dealer can submit the application on the participant's behalf and provide the discount to the customer on its invoice.
- b. Please provide the expected wait time between submission of an application and a participant receiving a rebate.
- c. Please provide the average wait time between requesting an audit and receiving an audit.
- d. Please provide the number of participating dealers in the HEIP in 2025 and the number of participating dealers expected in 2026. If there is an increase, please explain how the Company plans to recruit additional participating dealers.
- e. Please explain the enrollment or qualification requirements for a participating dealer to join the program.
- f. Please explain any training or education provided to participating dealers on the eligible equipment, program details, and marketing guidance.

1.14. Refer to Cobern Direct Testimony, page 8 line 17 through page 9 line 2.

- a. Please provide the start date for the HVAC program incentives.
- b. Please explain how the Company believes it is prepared to roll out HVAC program incentives in 2026 when it was not able to roll out the lighting

incentives as described. Provide the reasoning and any supporting documentation.

c. Please explain whether the Company still plans to wait to provide rebates for food service equipment until year 3 or if it will offer these incentives in year 2. Provide the reasoning and any supporting documentation.

1.15. Refer to Cobern Direct Testimony page 9, lines 5-6.

- Please explain how the Company believes it will reach its forecasted level of spending based upon the annual cap per customer account.
- Please detail whether this annual cap per customer account will increase as the number of rebated measure offerings increases. If not, why.

1.16. Refer to Cobern Direct Testimony page 9, lines 20-22.

- Please provide the number of stakeholders and types of stakeholders that the Company has engaged with to date to promote the program.
- Please provide the number of applications received as part of this outreach effort.

1.17. Refer to Exhibit SNC-1, Program Costs Detail tab.

- The level of Admin costs for the General Residential and General Commercial was reported as \$35,177 and \$29,942, respectively, monthly for July through September.
  - Does the Company believe that this level of administrative cost will occur monthly in 2026 regardless of participation level or budget?
  - If not, what influences the level of administrative monthly cost?
  - How is the level of administrative cost determined for each sector and what is covered under this cost category?
- The delivery costs for the TEE program vary by month. Please indicate what the drivers are for this variance.
- Please detail what was funded through the TEE education budget.
- Please explain why the TEE cost per participant is forecasted to decrease in 2026 compared to 2025.

1.18. Refer to Exhibit SNC-1, Incentives tab.

- Please provide the marketing and program activity that will increase participation in the HEIP to 1,519 new participants in 2026.
  - Please explain how this forecasted level of participation is ramped up throughout the year.

- b. Please provide the marketing and program activity that will increase participation in the CESP to 272 new participants in 2026.
  - c. Please provide the pipeline for each program, only including committed or scheduled projects.
- 1.19. Refer to Exhibit SNC-1, Lost Revenue tab.
  - a. Please detail whether the net energy savings are based on savings determined by a per home savings assumption or on actual installed measures in 2025.
  - b. Please provide the list of measures and number of each measure installed in homes in 2025 under the TEE program.
- 1.20. Related to the staffing levels of the Company's implementation contractor, referred to in Cobern Direct Testimony, page 9, line 8:
  - a. Please detail the number of staff dedicated to the Company's DSM programs.
  - b. Please detail the number of staff located within the state of Kentucky.
  - c. Please detail the number of staff located outside of Kentucky.
  - d. Please state whether the implementation contractor plans to hire more staff to support the increased budgets if approved by the Commission.
- 1.21. For each program, please provide the requirements for participating contractors or vendors to participate in the program, including but not limited to required training, credentials, bonding, and insurance.
- 1.22. For each program please provide the vendor/participating contractor certification process.
- 1.23. For each program provide copies of any applicable vendor/participating contractor application materials.
- 1.24. With respect to the underspent funds from 2025, please provide the following:
  - a. Please name the account in the USoA where funds are held.
  - b. Is the account interest-bearing, or does it otherwise gather interest or carrying costs?
    - i. If yes, please explain where any interest accrued is held, and how it is expended;
    - ii. If no, why not?
  - c. If so, is the interest earned returned to the customer?

- 1.25. Please explain where fees collected under the DSM rider are held until expended, including the following.
  - a. Please name the account in the USoA where funds are held.
  - b. Is the account interest-bearing, or does it otherwise gather interest or carrying costs?
    - i. If yes, please explain where any interest accrued is held, and how it is expended;
    - ii. If no, why not?
  - c. If so, is the interest earned returned to the customer?
- 1.26. Please detail whether or not the Company markets its DSM programs through its AMI initiative. If so, please detail how.

[SIGNATURES ON FLOWING PAGE]

Respectfully Submitted,



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#### **CERTIFICATE OF SERVICE**

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on January 21, 2026; that the documents in this electronic filing are a true representation of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



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Byron L. Gary