

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:

- 2.1. Please refer to the Company's response to Kentucky Public Service Commission Request 1_2. Please explain what is funded by the Company on projects that combine health- and safety-related heat pump replacements with DSM measures.
- 2.2. Please refer to the Company's response to Kentucky Public Service Commission Request 1_3 and Kentucky Public Service Commission Request 1_16.
 - a. Please explain why the Company believes that Community Action Agencies will be able to not only spend the projected 2026 budget but also the unspent 2025 funds.
 - b. Please explain whether the Community Action Agencies are aware that they would be staffing up for a TEE program that will decrease in 2027 if spending occurs as projected by the Company.
- 2.3. Please refer to the Company's response to Kentucky Public Service Commission 1_15.
 - a. If there are increased administrative costs compared to the forecast due to the extended ramp up period, would the Company expect the cost-effectiveness of the programs to remain cost-effective?
 - b. Please provide the actual cost-effectiveness calculation for 2025.
 - c. Please provide the projected cost-effectiveness based upon the Company's proposed shifts in budget.
- 2.4. Please refer to the Company's response to Kentucky Public Service Commission 1_17.
 - a. Please explain why the ramp up of the program took from March 1 through September 2025 to recognize participation.
 - b. Please explain when Kentucky Power would have needed to receive Commission approval to launch the CESP by January 2025.
- 2.5. Please refer to the Company's response to Joint Intervenor Request 1_1. Would the Companies agree that the performance of the programs is the responsibility of Kentucky Power regardless of who is the administrator of the program?

- 2.6. Please refer to the Company's response to Joint Intervenor Request 1_4. Please provide the number of customers that have submitted an application and are waiting for an audit.
- 2.7. Please refer to the Company's response to Joint Intervenor Request 1_5.
 - a. Please provide the number of customers in the pipeline that are interested in a home energy assessment.
 - b. Is the Company or its implementor, TRC, aware that the ramping up and down program funding can cause program dissatisfaction among potential participants and participating vendors?
- 2.8. Please refer to the Company's response to Joint Intervenor Request 1_8. If there are no monthly forecasts for participation, savings, or spending, please explain how the Company will know that it is on track to meet its forecasts.
- 2.9. Please refer to the Company's response to Joint Intervenor Request 1_10. With the projected increase in HVAC costs, does the Company plan to adjust incentive levels?

[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 February 18, 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.



Byron L. Gary