

**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		

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

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Dated: July 06, 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 Intervenors" means Appalachian Citizens' Law Center and Mountain Association who have been granted 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."
21. "TRC" means "TRC Companies."
22. "RFP" means "Request for Proposal."

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 Intervenor 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 Intervenor 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.

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

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

- 3.1. Please refer to the hearing testimony of Company Witness Stevi Cobern at HVT 9:29:00 to 9:33:30 a.m., and provide or explain :
 - a. The name and other identifying information of any subcontractor(s) performing work under HEIP;
 - b. The name and other identifying information for any other subcontractor(s) of TRC performing work under any other tariff at issue in this case;
 - c. Copies of any currently effective contracts between the Company and its contractor, TRC, related to the Company's DSM programs;
 - d. Copies of any currently effective contracts between agents or contractors of the Company, including TRC, and any subcontractors performing work under any tariff at issue in this case;
 - e. How did TRC retain any subcontractors? E.g., was a request for proposals ("RFP") issued? Please provide any such RFP, and any responses; and
 - f. How many staff of administrator/contractor and implementer/subcontractor work full time on programs under the tariffs at issue in this case.
- 3.2. Please refer to the hearing testimony of Company Witness Stevi Cobern at 9:31:30 to 9:33:20 a.m., 9:38:00 to 9:48:00 a.m., 10:14:30 to 10:17:20 a.m., and provide or explain:
 - a. Each monthly update on program implementation provided by TRC not previously provided in the record in this case. If updates have not been provided on a monthly basis, please explain why not and provide each update from TRC;
 - b. Are trade allies eligible to receive direct rebates from the Company for installation of eligible measures?
 - c. Are non-trade ally contractors eligible to receive direct rebates from the Company for installation of eligible measures?
 - d. Explain in full the specific benefits) of becoming a trade ally?

- e. Provide the total number of ratepayers who received audits by month under
 - i. HEIP, and
 - ii. CESP;
- f. Is there a standardized checklist or form utilized by auditors under either HEIP, or CESP? If so, please produce a copy of each such standardized checklist or form. If not, please explain why not.
- g. Is there a standardized reporting form utilized by auditors to record the installation of direct measures and recommendations provided to the participating customer by the auditor? If so, please produce a copy of the reporting form(s), and explain how information collected from those reporting forms is provided to the Company. If not, please explain why not
- h. The total number of ratepayers who received direct installs of measures by month under
 - i. HEIP, and
 - ii. CESP;
- i. Identify the direct install measures received by each participant to date in 2026 under
 - i. HEIP, and
 - ii. CESP;
- j. The total number of ratepayers or trade allies who received rebates and measures rebated by month under
 - i. HEIP, and
 - ii. CESP;
- k. The total number of ratepayers by month in the “pipeline” for
 - i. HEIP, and
 - ii. CESP;
- l. The targeted kWh savings under
 - i. HEIP, and

- ii. CESP;
 - m. The amount of kWh savings achieved, and explanation of how this amount was calculated; and
 - n. Does TRC track measures installed during audits? Please provide any such tracking information, or explain why tracking is not done.
- 3.3. Please refer to the hearing testimony of Stevi Cobern at HVT 10:00:30 to 10:01:20 a.m., and provide a copy of the referenced DOE guidelines regarding Savings-to-Investment Ratio.
- 3.4. Please provide
- a. spending in 2026 by month by marketing, administration, and program spending for
 - i. HEIP,
 - ii. CESP, and
 - iii. TEE;
 - b. Please provide the monthly budget by marketing, administration, and program spending in 2026 for
 - i. HEIP,
 - ii. CESP, and
 - iii. TEE;
 - c. State whether the Company has over or under spent the budget for each month, and by how much; and
 - d. State whether the Company has over or under recovered for the program(s) for each month, and by how much.
- 3.5. Please refer to the hearing testimony of Stevi Cobern at HVT 09:36:00 to 09:38:00 a.m., Exhibit SNC-R1, and Exhibit SNC-R2, and confirm that the Company calculates lost revenues using an anticipated average energy savings per ratepayer served under each program, and not related to actual installed measures. If anything other than confirmed, explain.

- 3.6. Please refer to the hearing testimony of Stevi Cobern at HVT 10:11:00 to 10:13:00 a.m. and the Company's Response to Joint Intervenor's initial data request number 9, and state how many contractors have been "secured" for
- a. HEIP,
 - b. CESP lighting, and
 - c. CESP HVAC.
- 3.7. Provide communications between TRC and the Company concerning implementation of the HEIP and CESP. Please include in your response all presentations, meeting notes, and written updates in addition to electronic communications and phone logs.
- 3.8. Please refer to the hearing testimony of Stevi Cobern at HVT 10:20:00 to 10:21:08 a.m., and provide the resume of the external affairs employee Ryan Lake. To the extent not evidence of the face of that resume, please explain in full that employee's qualifications and experience with respect to demand-side management program implementation.

[SIGNATURES ON FOLLOWING 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 July 06, 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