

Kentucky Power Company  
KPSC Case No. 2025-00365  
Joint Intervenors' First Set of Data Requests  
Dated January 21, 2026

**DATA REQUEST**

**JI 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.

**RESPONSE**

a.-c. As an initial matter, it is important to remember that the community action agencies administer the Company's TEE Program. Community action agencies did not use any of the \$15,000 budget for the TEE Program Weatherization Readiness Fund in 2025. It is the Company's understanding that the agencies instead focused on utilizing funds from the \$1 million Kentucky Power Foundation Grant, which can also address health, safety, and structural issues that otherwise would prevent a home from qualifying for additional weatherization. The Company discussed this with the community action agencies and stressed the importance of combining the TEE Program Weatherization Readiness Fund with the grant funds and federal Weatherization Readiness Fund to ensure as many homes as possible can qualify for weatherization assistance.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_2** For the TEE program's proposed 2026 budget, please detail the budget by cost category.

**RESPONSE**

The TEE Program budget is the same as that approved in Case No. 2024-00115. The below table provides a cost breakdown.

<b>TEE</b>	<b>2026</b>
Administration	\$27,000
Customer Education	\$7,125
Installed Measures	\$335,935
<b>Total</b>	<b>\$370,060</b>

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_3** For the TEE program, please provide the average wait time between requesting an audit and receiving an audit.

**RESPONSE**

Community action agencies do not provide the Company with the data required to determine the average wait time between requesting an audit and receiving an audit. The Company is only provided data regarding the time between when a customer initially contacts the community action agency to apply for weatherization assistance and when the weatherization measures are actually installed. The average wait time from a customer applying for the TEE Program to the installation date for energy efficiency measures in 2025 was 66 days.

Witness: Stevi N. Cobern

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**JI 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.

**RESPONSE**

- a. The Company has program information available on its website at <https://www.kentuckypower.com/savings/home/targeted-energy-efficiency>. Additionally, Company customer service representatives can discuss the program with customers. However, customers must contact a community action agency to determine if they are income qualified.
- b. The Company does not maintain call records in a manner sufficient to answer this request.
- c. Yes, the community action agencies maintain a waitlist ranked by priority points determined by different factors such as income, age, and disability status.
- d. The Company does not maintain records for customer income but has limited insight into customer incomes based on customers who participate in either LIHEAP, LIHEAP Crisis, and/or the Company's HEART program. Notably, it is probable that not all customers eligible for these programs apply and not all customers who apply for these programs are eligible to participate. Please see KPCO\_R\_JI\_1\_4\_Attachment1.

Witness: Stevi N. Coborn

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**DATA REQUEST**

**JI 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.

**RESPONSE**

- a. The HEIP and CESP programs were approved as a three-year pilot. The Company is working diligently to achieve customer participation at the level estimated for the three-year pilot time period. The Company is working with the program implementation contractor and administrator (TRC) to create a list of accounts that can be proactively contacted for participation in the HEIP program with focus on high usage accounts that may benefit from a home energy audit and energy efficiency measures. Additionally, through program marketing and word-of-mouth, TRC has created a pipeline of customers interested in a home energy assessment and has sufficient subcontractor capacity to complete home evaluations to meet the participation numbers for 2026.
- b. Please see KPCO\_R\_KPSC\_1\_4\_Attachment1.
- c. and d. The Company meets regularly with TRC to discuss the HEIP and CESP programs. The Company will continue to work with TRC to discuss best practices and the budget and plans for engaging customers to promote program participation, and will adjust as needed to the budget.

Witness: Stevi N. Coborn

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## **DATA REQUEST**

**JI 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.

## **RESPONSE**

- a. The budget for both year one and year two of the CESP program has not changed. However given that the roll-out of the program was delayed due to not receiving the order in Case No. 2024-00115 until the end of February 2025, the Company adjusted the year two budget to include the remaining year one budget in order to maximize the availability DSM measures in 2026.
- b. Please see the Company's response to JI 1\_5(a). Additionally, the Company has met with Mountain Association to discuss the CESP program and seek collaboration in identifying customers who may benefit from the program. Through outreach and marketing, the administrator (TRC) has a pipeline of 17 customers interested in pursuing projects. Program awareness will be greater month –over-month through continued marketing, outreach, and word-of-mouth from program participants. Regardless, customers will ultimately only be responsible for the amounts the Company actually spends given the true-up mechanism in this rider.

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- c. Please see KPCO\_R\_KPSC\_1\_4\_Attachment1.
- d. and e. Please see the Company's response to JI 1\_5(c & d).

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 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.

**RESPONSE**

The Company proposed to roll over the unspent 2025 budget into 2026 to allow additional funds to immediately be available for the DSM programs. The Company is working closely with the program administrator to create lists of accounts to proactively contact customers who may benefit from energy audits and energy efficiency improvements in their home or business. To the extent that the 2026 budget is not fully spent, the amounts actually spent will be trued up in the Company's next DSM annual update, and the Company would have the ability to roll any unspent budget from 2026 into 2027. However, given that these programs were only approved as a three-year pilot program, the Company's goal is to fully meet the projections from its initially filed application in Case No. 2024-00115, which would mean the Company has to make up for the delay in program implementation in calendar years 2026 and 2027.

Witness: Stevi N. Cobern

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**JI 1\_8** For each program, please provide the monthly forecasted spending, participation, and savings for 2026.

**RESPONSE**

The Company does not forecast program spending, participation, and savings on a monthly basis, only on an annual basis. The annual numbers are provided in Exhibit SNC-1.

Witness: Stevi N. Cobern

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**JI 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.

**RESPONSE**

- a. TRC is the program implementation contractor for both the HEIP and CESP Programs. Earth Right Mid Atlantic is a subcontractor to TRC and is responsible for home energy assessments and installation of direct install measures for the HEIP program. To date, nine contractors have participated in rebates for the HEIP program.

To date, one contractor has participated in the CESP program. In 2025, all projects were lighting projects and most were installed by customer facility personnel. The number of contractor participants will increase in 2026 with the addition of HVAC.

Through continued outreach and marketing, additional contractors will participate in the contractor network or submit eligible projects on behalf of customers.

- b. TRC is working to secure the participation of ten HVAC contractors that serve residential, commercial, or both programs.

Witness: Stevi N. Coborn

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**DATA REQUEST**

**JI 1\_10** Please detail all market factors the Company foresees impacting the program participation, either negatively or positively.

**RESPONSE**

Multiple customer touchpoints for marketing and outreach, including word-of-mouth from customer satisfaction, will make positive impacts in gaining additional participants. HVAC costs could be slightly higher in 2026, potentially up to 10% higher, which could affect the programs.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 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.

**RESPONSE**

The Company is confident that program participation in 2026 will be significantly increased. The Company is working with the program administrator to create a list of accounts that can be proactively contacted for participation in the HEIP program with focus on high usage accounts that may benefit from a home energy audit and addressing energy efficiency measures. Additionally, the Company has met with Mountain Association to discuss the CESP program and seek collaboration in identifying customers who may benefit from the program. Through outreach and marketing, the administrator has a pipeline of customers interested in the programs. Program awareness will be greater month-over-month through continued marketing, outreach, and word-of-mouth from program participants.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 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.

**RESPONSE**

- a. and b. Please see KPCO\_R\_JI\_1\_12\_Attachment1.
- c. The program roll-out costs are reflected in Exhibit SNC-1 on the Program Cost Detail tab under the Admin column for General Residential and General Commercial.
- d. Marketing materials were updated as of January 2026 to include the HVAC incentives for the CESP program. This was a planned update, and prior printed copies anticipated this change.

Witness: Stevi N. Cobern

**Kentucky Power Corporate Communications Report for Promoting EnergyAdvantage in 2025:**

- Kentucky Power's July E-Newsletter
- Discussed on July 31 podcast
- Inclusion in rate case communications in August.
- Inclusion in September bill insert
- Ads for EnergyAdvantage ran in the month of September in the Appalachian New-Express newspaper in Pike County.
- Promoted in press release October 23
- Inclusion in weatherization customer E-newsletter October 28
- Direct mail targeting 13,622 previous LIHEAP participants
- Inclusion in December bill insert
- Radio ads in December on WSGS in Whitesburg and iHeartRadio stations in the northern territory.
- December podcast featuring Stevi Cobern discussed at length.
- Facebook posts / ads

Kentucky Power - EnergyAdvantage for Home						
Tactic	July	Aug	Sept	Oct	Nov	Dec
<b>Contractor Outreach</b>						
Launch Webinars		X				
One-Pager "Sell Sheets"	X					
Email Newsletter				X		
<b>Customer Outreach</b>						
Incentive Guides	X					
Program Collateral	X					
Website Updates	X					
Email Announcement	X					
Direct Mail Announcement		X				
Program Virtual Webinar		X				
Campaign Emails			X	X	X	X
Direct Mail Campaign			X		X	

Kentucky Power - EnergyAdvantage for Business						
Tactic	July	Aug	Sept	Oct	Nov	Dec
<b>Trade Ally Outreach</b>						
Launch Webinars		X				
One-Pager "Sell Sheets"	X					
Email Newsletter				X		
<b>Customer Outreach</b>						
Incentive Guides	X					
Program Collateral	X					
Website Updates	X					
Email Announcement	X					
Direct Mail Announcement		X				
Program Virtual Webinar		X				
Campaign Emails			X	X	X	X
Direct Mail Campaign			X		X	

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**DATA REQUEST**

**JI 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.

**RESPONSE**

- a. Both the HEIP and CESP programs have online applications. The customer can submit the project through the application portal, or their contractor can submit on their behalf. Incentive payments can be directed to either the contractor or the customer.
- b. The typical timeline is 30-45 days after submission of an application to receive payment, provided that the application and all supporting documentation are complete and accurate. The program processes applications daily and reaches out to customers or trade allies to secure additional project details or documentation that may have been incomplete with their original submission.

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- c. Customers requesting a home energy assessment are contacted after their initial request to make them aware their request has been received and the subcontractor is reaching out to schedule the assessment. The contractor will then contact the customer, and the timeline depends on whether the customer can be immediately contacted or if there is a delay in reaching the customer. Additionally, the contractor will work with the customer to schedule a convenient time for the home assessment and direct install appointment. In the early months of the program this time may have been extended to two to three weeks based on customer and contractor availability. Now that a pipeline of customer requests and additional contractor resources have been added, this timeline will be shortened to less than two weeks based on the ability to schedule a convenient time with the customer.
- d. Earth Right Mid Atlantic is the residential contractor for the completion of home energy assessment and direct install measures. The program administrator is completing outreach to other contractor professionals (insulation, HVAC, and hot water heater) to participate in the program for customers interested in program rebates. To date, nine contractors have participated in customer rebate projects, however, the target is 20 participating contractors for residential energy efficiency rebates.
- e. Information to join the Trade Ally network can be found at <https://trc.jotform.com/team/kpco/kentucky-power-trade-ally-app>. Contractors and Trade Allies do not have to formally join the Trade Ally Network to participate. Contractors must provide professional licenses, invoices, and website/contact information to become a contractor completing work for residential customers to apply for HEIP rebates.
- f. Participating trade allies receive onboarding training to become familiar with all program requirements. Program marketing materials are provided to share and review with customers. Contractors and trade allies also are invited to participate in program and technical webinars.

Witness: Stevi N. Coborn

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**DATA REQUEST**

**JI 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.

**RESPONSE**

- a. The HVAC program incentives were effective as of January 1, 2026.
- b. The Company disagrees with the assertion that the lighting incentives were not rolled out as described. The only difference from the as filed position in Case No. 2024-00115 was the delay in implementation due to not receiving an order approving the programs until the end of February, 2025. The HVAC incentives for the CESP program were effective in the online application portal prior to January 1, 2026. Program collateral resources have been updated with the new HVAC incentive category.
- c. The Company plans to offer incentives to include food service equipment in year three as originally proposed. The Company proposed to roll out incentives over a three-year period to ramp up the program gradually and limit the impact to the DSM surcharge and customer bills.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_15** Refer to Cobern Direct Testimony page 9, lines 5-6.

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

**RESPONSE**

- a. The total maximum rebate available to qualifying commercial customers is \$25,000 annually per customer account as approved for the three-year pilot. The Company is engaging with Mountain Association and the program administrator to proactively contact customers and promote program participation. Through outreach and marketing, the administrator has a pipeline of customers interested in pursuing projects. Program awareness will be greater month-over-month through continued marketing, outreach, and word-of-mouth from program participants.
- b. The CESP program was approved as a three-year pilot. Near the end of the pilot period, the Company will evaluate the effectiveness of the program and determine if adjustments are required should the Company seek to extend the program beyond the pilot period.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_16** Refer to Cobern Direct Testimony page 9, lines 20-22.

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

**RESPONSE**

a. and b. The Company has met with Mountain Association along with the program administrator to collaborate about the DSM program, discuss opportunities for improvement and customer accounts to proactively contact customers to promote program participation. Through this collaboration, one potential customer has been added to the pipeline. The Company plans to continue this collaborative effort.

Witness: Stevi N. Cobern

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## **DATA REQUEST**

**JI 1\_17** Refer to Exhibit SNC-1, Program Costs Detail tab.

- a. 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.
  - i. Does the Company believe that this level of administrative cost will occur monthly in 2026 regardless of participation level or budget?
  - ii. If not, what influences the level of administrative monthly cost?
  - iii. How is the level of administrative cost determined for each sector and what is covered under this cost category?
- b. The delivery costs for the TEE program vary by month. Please indicate what the drivers are for this variance.
- c. Please detail what was funded through the TEE education budget.
- d. Please explain why the TEE cost per participant is forecasted to decrease in 2026 compared to 2025.

## **RESPONSE**

- a. No, the initial invoices received from the program administrator for the HEIP and CESP programs included program implementation costs that were necessary to roll out the programs. The monthly administrative cost can vary due to several factors including but not limited to:
  - the Company's and TRC's aim to decrease implementation expenses such as IT, marketing and administration year-over-year while increasing incentives as program awareness and participating dealers are onboarded;
  - adjustments for inflation;
  - additional labor hours as participation targets increase; and
  - adjustments in year three to account for end of cycle pushes to completion.
- b. There is no set cost per house for participants of the TEE program. The program costs vary month to month due to the number of participants, the installed measures, and the cost of those measures. Community action pays for the installation measure through funding from the DOE Weatherization Assistance Program, TEE, and other programs as needed so the cost of an installed measure is not static.

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- c. The TEE program customer education expense covers a booklet on energy efficiency that is provided to customers, as well as agency time to walk through helpful conservation tips with the customer.
- d. The Program Costs Detail tab on Exhibit SNC-1 does not contain a cost per participant number nor is it calculable solely with the information on this tab. Accordingly, the Company is unable to provide a response.

Witness: Stevi N. Cobern

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## **DATA REQUEST**

**JI 1\_18** Refer to Exhibit SNC-1, Incentives tab.

- a. Please provide the marketing and program activity that will increase participation in the HEIP to 1,519 new participants in 2026. i.: 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.

## **RESPONSE**

- a. Both the Company and the program administrator are conducting marketing activities to increase participation including customer emails, social media, direct mail, outbound phone calls, and program collateral distributed throughout the service territory. The program administrator will also participate in community gathering locations to provide program marketing material. Additionally, HEIP participants sharing their experience with family and community members provide an important aspect of marketing through word of mouth.

The combined kWh goal for 2025-2026 can be achieved in 2026 based on an average of 35 projects per month (home energy assessments and rebates). The HEIP subcontractor with current staffing can complete assessment on 45-50 homes per month. Marketing and outreach activities will continue to encourage customer interest and maintain a strong pipeline of homes and projects.

- b. Both the Company and the program administrator are conducting marketing activities to increase participation. These activities include in person outreach, customer and contractor emails, social media, direct mail, and program collateral distributed throughout the service territory. The program administrator will also participate in industry and business setting to discuss the incentive opportunities and program benefits.

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The combined kWh goal for 2025-2026 can be achieved in 2026 based on an average of 35,000 kWh per project by securing ten commercial projects per month. Marketing and Outreach activities will continue to encourage customer and contractor interest and maintain a strong pipeline of project activity.

c. The program administer currently has 63 customers in the pipeline for the HEIP program and 17 customers in the pipeline for the CESP program.

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## **DATA REQUEST**

**JI 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.

## **RESPONSE**

a. The net energy savings are based on savings determined by a per home savings assumption.

The net energy impact information for the TEE program comes from the 2015 Kentucky Power Company Demand Side Management Program Plan which was filed as Exhibit 6 to the DSM Application in Case No. 2015-00271.

First, take the Energy Savings for the TEE program (443 MWh) from the Targeted Energy Efficiency – Incremental Net Savings, Mid Scenario on page 69. Next, convert the 443 MWh to kWh by multiplying by 1,000. Finally, divide the 443,000 kWh by the number of participants (175) listed on the Estimated Participation table. The product is the net energy impact of 2,531 kWh per participant.

The net impacts are calculated in the same fashion for HEIP and CESP. The total kWh of projected savings from the new programs is divided by the projected number of participants in the new programs to arrive at a net energy impact per customer. For the HEIP, the incremental net savings for the program scenario is 417,000 kWh. This total savings is divided by the projected number of participants (661) to arrive at the net energy impact of 631 kWh per participant.

For the Commercial Energy Solutions Program, the total incremental net savings for the program scenario is 2,537,909 kWh divided by the projected number of participants (130) to arrive at the net energy impact of 19,522 kWh per participant.

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b. Please see the chart below for the list and number of measures installed in homes in 2025 using funds from the TEE Program. Note that because TEE is supplemental to the DOE Weatherization Assistance Program, which would have provided for additional measures to be installed at homes in conjunction with benefits from the TEE Program.

Air Leakage	28
Duct Sealing	23
Attic Insulation	28
Floor Insulation	26
Heating System Replacement	63
Hot Water Measures	15
Lighting	10

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 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.

**RESPONSE**

a. The program administrator, TRC has multiple support teams providing implementation support for the HEIP and CESP program. These positions include Outreach, Marketing, IT/Database, Management, Operations (including Call Center), and QA QC. Combined staff hours are 3.5 full time employees.

Additional staff support the HEIP through the subcontract with Earth Right Mid Atlantic.

- b. TRC has one full-time outreach person located in Kentucky. Additionally, the subcontractor for HEIP has Kentucky based team members.
- c. The remaining staff supporting the HEIP and CESP programs are located across multiple locations providing expertise to support specific program functions.
- d. Yes, TRC would add outreach support. Additionally, the subcontractor for HEIP would hire additional staff to support increased production.

Witness: Stevi N. Cobern

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## **DATA REQUEST**

**JI 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.

## **RESPONSE**

Trade Ally and its participating subcontractors must maintain all licenses, permits, certifications, authorizations, consents, or approvals of all appropriate governmental authorities and all public or private boards and bodies necessary to legally perform work. Trade Ally must provide a copy of their Kentucky Business License (appropriate for services offered), certificate of good standing that all taxes are paid to the Kentucky Department of Revenue, and provide the certificates outlined below, as applicable:

- For Trade Allies who claim Minority and/or other Diverse Business Status, a copy of that certificate applicable to the jurisdiction that the work is performed;
- If work performed by the Trade Ally involves electrical improvements, a Master or General Electrician is required to be on staff or under contract, and a copy of that certification;
- A Trade Ally completing HVAC installation or handling refrigerant must hold certification(s) appropriate for the services offered/ equipment sold or serviced and provide a copy of that certification; and
- A minimum of one (1) employee must hold the certification or license described above. If other personnel performing work do not hold the appropriate certification or license, a process plan must be provided explaining how the qualifying person is responsible for the final work being performed. The Program Implementer reserves the right to request any updated certificates held by the Trade Ally, as may be required.

Trade Ally shall obtain and maintain sufficient insurance, including but not limited to general liability insurance, to cover all of Trade Ally's operations under this Agreement. Except for Professional Liability and Workers Compensation, TRC Solutions, Inc. and Kentucky Power shall be named as Additional Insured. Prior to commencing work hereunder, Trade Ally shall provide TRC with certificates of insurance evidencing such coverage. Unless otherwise specified, the following minimum levels of insurance are required in USD:

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1. Commercial General Liability Insurance: Each Occurrence Limit \$1,000,000 & General Aggregate Limit: \$2,000,000;
2. Automobile Liability (Owned, Non-owned, and Hired Vehicles): \$1,000,000;
3. Worker's Compensation: Statutory / Employer's Liability: \$1,000,000;
4. Professional Liability (if applicable): \$1,000,000; and
5. If the Work involves access to any PII, such as residential customer data, and if Trade Ally accesses, stores or processes any customer data, Trade Ally is required to provide Cyber Liability Insurance with limits of not less than \$1,000,000 per occurrence, and \$1,000,000 in aggregate, coverage shall include but not limited to computer or network system attacks, denial or loss of service, introductions, implantation, or spread of malicious software code, theft, loss or misuse of data, release of private information and responsibility for costs, fines and penalties incurred by Company or Program Implementer. Cyber Liability may be part of Trade Ally's Professional Liability insurance, if this is the case it shall be stated on the Certificate of Insurance

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_22** For each program please provide the vendor/participating contractor certification process.

**RESPONSE**

Contractors and Trade Allies are required to participate in Trade Ally onboarding training. Trade Allies are also invited to participate in a monthly webinar for program updates and industry/technology presentations. Trade Allies also must have a professional license to work in Kentucky. Insurance levels are detailed in the Trade Ally Agreement.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_23** For each program provide copies of any applicable vendor/participating contractor application materials.

**RESPONSE**

Trade Allies and contractors will complete the online application to participate in the HEIP and CESP programs at <https://trc.jotform.com/team/kpco/kentucky-power-trade-ally-app>. Although not required, contractors are encouraged to join the Trade Ally Network. The application requests information on services offered, counties served, and business license.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 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?

**RESPONSE**

- a. through c. The over-recovery balance (which is inclusive of any underspent funds) as of December 31, 2025, is recorded to account 2543247. The Company does not earn or pay a return on the over/under balance, respectively.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 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?

**RESPONSE**

a.-c. The DSM program costs are initially recorded to account 9080009 and DSM revenues are recorded to account 4560007, until deferred. The Company does not earn or pay a return on the over/under balance.

Witness: Stevi N. Cobern

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**DATA REQUEST**

**JI 1\_26** Please detail whether or not the Company markets its DSM programs through its AMI initiative. If so, please detail how.

**RESPONSE**

The Company has not started marketing its AMI initiative but plans to start later this year closer to the time when meter installation will begin. The Company will evaluate its communication plan and determine key topics for discussion which may include DSM programs along with other customer benefits and billing options.

Witness: Stevi N. Cobern

## VERIFICATION

The undersigned, Stevi N. Cobern, being duly sworn, deposes and says she is a Regulatory Consultant Principle for Kentucky Power, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Signed by:

*Stevi Cobern*

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Stevi N. Cobern

Commonwealth of Kentucky )  
                                    )  
County of Boyd            )  
Case No. 2025-00365

Subscribed and sworn to before me, a Notary Public in and before said County  
and State, by Stevi N. Cobern, on 1/28/2026 | 8:47 AM EST.

Signed by:

*Michelle Caldwell*

E9B1BC7AC31F421...

Notary Public

05/05/2027  
My Commission Expires \_\_\_\_\_

MARILYN MICHELLE CALDWELL  
ONLINE NOTARY PUBLIC  
COMMONWEALTH OF KENTUCKY  
Commission #KYNP71841  
My Commission Expires 5/5/2027

KYNP71841  
Notary ID Number \_\_\_\_\_