

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 Rebuild The Allen Station In	)	Case No. 2026-00208
Floyd County, Kentucky (“Allen Station Rebuild	)	
Project”)	)	

DIRECT TESTIMONY OF

JASMINE L. MOORE

ON BEHALF OF KENTUCKY POWER COMPANY

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I. INTRODUCTION

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

A. My name is Jasmine L. Moore. My business address is 8500 Smiths Mill Road, New Albany, Ohio 43054. I am employed by American Electric Power Service Corp. (“AEPSC”) as a Transmission Planning Manager. AEPSC is a wholly-owned subsidiary of American Electric Power Company Inc. (“AEP”), the parent Company of Kentucky Power Company (“Kentucky Power” or the “Company”).

II. BACKGROUND

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.

A. I received a Bachelor of Science Electrical Engineering degree from Ohio Northern University in Ada, Ohio. In 2002, I joined AEP as a Protection and Controls Engineer in the Station Projects Engineering Group. I received my Professional Engineering license in the state of Ohio in 2006 (license number 71494). In 2007, I transitioned to the Planning group where I was initially a Planning Engineer. In 2016, I became the Planning Customer Connections Supervisor. In 2017, I became the Transmission Planning Manager for the Ohio Region and transitioned to the Appalachian Power and Kentucky Power Region Planning Manager in 2018.

1 **Q. WHAT ARE YOUR RESPONSIBILITIES AS TRANSMISSION PLANNING**
2 **MANAGER?**

3 A. My responsibilities include organizing and managing activities related to assessing the
4 adequacy of AEP’s transmission network to meet the needs of its customers in a reliable,
5 safe, cost-effective, and environmentally compatible manner. I participate in planning
6 activities with Kentucky Power to address overall system performance.

III. PURPOSE OF TESTIMONY

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. I am testifying in support of Kentucky Power’s Application for a certificate of public
9 convenience and necessity authorizing Kentucky Power to rebuild the Allen Substation in
10 Floyd County, Kentucky (the “Allen Rebuild Project” or the “Proposed Project”). The
11 Proposed Project will rebuild Allen Substation at its current location and the equipment
12 will be elevated due to historical flooding.

13 **Q. ARE YOU SPONSORING ANY EXHIBITS OR ATTACHMENTS IN THIS**
14 **APPLICATION?**

15 A. Yes, I am sponsoring **EXHIBIT 13**, which provides a comparison of the Proposed Project
16 with alternatives that I discuss later in this testimony. Additionally, I am supporting
17 **EXHIBIT 10**, which is the information presented at the PJM Sub-Regional RTEP-Western
18 meeting demonstrating the baseline violations being addressed by the Proposed Project as
19 well as supplemental needs that are addressed as part of the baseline solution.

IV. PROJECT DESCRIPTION

1 **Q. PLEASE DESCRIBE THE ALLEN SUBSTATION.**

2 A. Allen Station is located in Allen, Kentucky in Floyd County. The Allen Substation is a
3 46kV Substation consisting of four 46kV breakers, a 46kV 17.2 MVAR capacitor bank,
4 two 46kV circuit switchers, a 20 MVA 46/12kV distribution transformer, and three 12kV
5 circuit breakers. The Allen Substation is connected to Stanville, Prestonsburg, and
6 McKinney Substations. Allen Substation serves 739 distribution customers. Please see
7 **EXHIBIT 4** for a map of the Substation and surrounding area.

8 **Q. PLEASE PROVIDE AN OVERVIEW OF THE PROPOSED PROJECT.**

9 A. The Allen Substation will be rebuilt as a straight bus station with four 69kV circuit breakers
10 (operating at 46kV) and a 17.2 MVAR capacitor bank. A new 46/12kV 20MVA distribution
11 bank will also be installed. The Company will also replace limiting equipment for the
12 Stanville-Allen transmission line with higher rated components. The transmission lines
13 that currently connect to the Allen Substation will remain in their current position and will
14 be connected to the rebuilt Allen Substation.

15 During the rebuild, Allen Substation equipment will be placed on raised platforms or have
16 elevated structures installed. Most Substation equipment will be raised approximately
17 eight feet, elevating the electrical components approximately ten feet from the ground total.
18 The control house will be replaced and will be elevated approximately fifteen feet off the
19 ground. The Company anticipates using elevated platforms, allowing inspection and
20 maintenance to be done from the elevated platform.

V. TRANSMISSION PLANNING AND EXPANSION

1 Q. HOW DID THE PROPOSED PROJECT ORIGINATE?

2 A. The existing Allen Substation, which was built in the 1930s, has historically experienced
3 severe flooding due to the Substation's current location in the floodplain. These flooding
4 issues have led to significant deterioration of the Substation's foundations and structures.
5 The Proposed Project began as a supplemental solution but was converted into a baseline
6 solution in 2021 due to violations identified in the 2026 RTEP-Winter case. An N-1-1¹
7 outage of 46kV sources from Thelma and Beaver Creek would force the power to flow
8 through Stanville-Allen line section causing it to overload. The overloaded equipment is
9 the relay limits and the bus at Allen Substation.

10 Q. HAS THE PROPOSED PROJECT BEEN REVIEWED THROUGH THE PJM
11 PROCESS?

12 A. Yes. The Proposed Project has been through the supplemental and baseline RTEP process.
13 The supplemental need for Allen Substation was presented during the July 24, 2019
14 meeting. The Proposed Project was originally presented as a supplemental project during
15 the October 16, 2020 meeting. The Proposed Project was then converted to a baseline
16 project after violations were found during the 2021 RTEP Window. The first baseline

¹ An N-1-1 outage refers to the loss of load, generation, or transfer capability resulting from a contingency scenario in which one system component is already out of service and a second component also fails, causing a reduction in the amount of energy that can be reliably delivered by the power system.

1 review for the project was at the October 15, 2021 RTEP meeting. The Proposed Project
2 was selected on November 19, 2021. Please see **EXHIBIT 10** for the PJM Baseline slides.

VI. NEED FOR THE PROPOSED PROJECT

3 Q. WHY IS THE PROPOSED PROJECT NECESSARY?

4 A. The Proposed Project will address identified baseline violations of FERC 715 Reliability
5 Standards.² From a baseline perspective, it was found in the 2026 Winter RTEP case that
6 an N-1-1 outage of 46kV sources from Thelma and Beaver Creek would force the power
7 to flow through Stanville-Allen line section causing it to overload.
8 Additionally, the existing Allen Substation has historically experienced severe flooding due
9 to the Substation's current location in the floodplain. Recurring flooding issues have led
10 to significant deterioration of the station's foundations and structures.

11 Q. PLEASE DESCRIBE HOW THE PROPOSED PROJECT ADDRESSES THE 12 NEEDS YOU IDENTIFY ABOVE.

13 A. The Proposed Project will replace the limiting equipment on the Stanville-Allen circuit
14 increasing the rating of this circuit and addressing thermal overload identified by PJM and
15 AEP. Raising and rebuilding the Substation at its current location will mitigate flood water
16 reaching station equipment.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

17 Q. WHAT ALTERNATIVES TO THE PROPOSED PROJECT WERE EVALUATED 18 BY THE COMPANY?

19 A. There were two alternative solutions the Company developed in addition to the
20 Proposed Project. First, the Company developed a plan to expand Allen Substation more

² https://docs.aep.com/docs/requiredpostings/TransmissionStudies/docs/2026/4-0_2026_AEP_PJM_FERC_715_Part_4.pdf

1 broadly and increase the footprint to make space for additional equipment.³ This
2 alternative would have included rebuilding the Allen Substation to the northwest of its
3 current footprint utilizing a standard air-insulated substation with equipment raised by
4 seven foot concrete platforms and control house raised by a ten foot platform to mitigate
5 flooding concerns, and installing five 69kV 3000A 40kA circuit breakers in a ring bus
6 (operated at 46kV) configuration with a 13.2 MVAR capacitor bank. This alternative
7 would require the Company to obtain floodplain permits and qualifying in-county
8 mitigation credits. Because there were not qualifying mitigation credits available for
9 expanding the footprint of the Allen Substation, the Company rejected this alternative.
10 Second, the Company considered rebuilding the Allen Substation in a new location (the
11 “Alternative Project”). The Company rejected this alternative because of the additional
12 cost associated with relocating the connecting transmission lines and landslide risks
13 associated with this alternative. Company Witness Benedum’s testimony provides
14 additional information regarding the alternatives considered.

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

16 **A.** Yes, it does.

³ This was presented to PJM as the supplemental solution on 10/16/2020.

VERIFICATION

The undersigned, Jasmine L. Moore, being duly sworn, deposes and says she is a Transmission Planning Manager for American Electric Power Service Corporation, that she 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 her information, knowledge, and belief after reasonable inquiry.

Signed by:

Jasmine L. Moore

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Jasmine L. Moore

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2026-00208

Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Jasmine L. Moore, on 7/29/2026 | 11:37 AM EDT.

Signed by:

Michelle Caldwell

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Notary Public

My Commission Expires 05/05/2027

Notary ID Number KYNP71841

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