



representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Kentucky Power's response to the Commission's October 2, 2025 Order and Motion to Dismiss, page 3 regarding Ms. Hurley's actual and estimated usage

for the three months at issue. Explain why the number of days in the December 2024 billing cycle was 39 days.

2. Refer to Kentucky Power's response to Commission Staff's First Request for Information (Staff's First Request), Item 4, Confidential Attachment 2.

a. For each bill identified in Confidential Attachment 2, indicate whether it is an actual or estimated bill.

b. Explain why meter read dates are included for October 23, 2024, November 21, 2024, and December 30, 2024.

c. Provide an updated version of Confidential Attachment 2 reflecting the same information for the period from July 2021 to June 2023.

d. State whether Kentucky Power has investigated or assessed why Complainant's usage is significantly above the usage of an average residential customer in Kentucky Power's service territory of about 1,210 kWh per month, and if so, explain the findings of any such investigation or assessment. If not, state whether there is any program available under which Complainant may qualify for an assessment of the drivers of her billed usage and if so, state the basis for allowing the Complainant to participate in the program.

3. Refer to Kentucky Power's response Staff's First Request, Item 4 and response to Staff's First Request, Item 1, Confidential Attachment 1. Reconcile the Complainant's account payments for September 2024, October 2024, and December 2024, for the estimated usage with the balance due on the January 2025 billing statement.

4. Refer to Kentucky Power's response to Staff's First Request, Item 6 indicating that "[t]he Company offered to establish a payment arrangement, but Ms. Hurley declined that offer." Explain any payment arrangements that could currently be made available to Complainant for any past due amounts.



Linda C. Bridwell, PE  
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DATED   **MAR 11 2026**  

cc: Parties of Record

Case No. 2025-00058

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