

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR (1) A GENERAL	)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC	)	
SERVICE; (2) APPROVAL OF TARIFFS AND	)	CASE NO.
RIDERS; (3) APPROVAL OF CERTAIN	)	2025-00257
REGULATORY AND ACCOUNTING	)	
TREATMENTS; AND (4) ALL OTHER REQUIRED	)	
APPROVALS AND RELIEF	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on or before either 14 days after submission of the rate application or 21 days after the date of this request, whichever is later. The Commission directs Kentucky Power to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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. Provide the following expense account data:
  - a. A schedule, in comparative form, showing the operating expense account balance for the base period and each of the three most recent calendar years for

each account or subaccount included in Kentucky Power's annual report. Show the percentage of increase or decrease of each year over the prior year.

b. A listing, with descriptions, of all activities, initiatives or programs undertaken or continued by Kentucky Power since its last general rate case for the purpose of minimizing costs or improving the efficiency of its operations or maintenance activities. Include all quantifiable realized and projected savings.

2. Provide, in the format provided in Schedule A, a schedule showing a comparison of the balance in the revenue accounts for each month of the base period to the same month of the immediately preceding 12-month period for each revenue account or subaccount included in Kentucky Power's chart of accounts. Include appropriate footnotes to show the month each rate change was approved and the month the full impact of the change was recorded in the accounts.

3. As the historical data becomes available, provide detailed monthly income statements for each of the months since the base period including the month in which the Commission hears this case.

4. Provide Kentucky Power's cash account balances at the beginning of the most recent calendar year and at the end of each month through the date of this request.

5. Provide the following monthly account balances and a calculation of the average (13-month) account balances for the 12 months preceding the base period:

- a. Plant in service (Account No. 101);
- b. Plant purchased or sold (Account No. 102);
- c. Property held for future use (Account No. 105);
- d. Completed construction not classified (Account No. 106);

- e. Construction work in progress (Account No. 107);
- f. Depreciation reserve (Account No. 108);
- g. Materials and supplies (include all accounts and subaccounts);
- h. Computation and development of minimum cash requirements;
- i. Balance in accounts payable applicable to amounts included in utility plant in service (if actual is indeterminable, provide a reasonable estimate.);
- j. Balance in accounts payable applicable to amounts included in plant under construction (if actual is indeterminable, provide a reasonable estimate.); and
- k. Balance in accounts payable applicable to prepayments by major category or subaccount.

6. Provide a detailed analysis of expenses for professional services during the 12 months preceding the base period, as shown in Schedule B, and all workpapers supporting the analysis. At a minimum, the workpapers should show the payee, dollar amount, reference (i.e., voucher no., etc.), account charged, hourly rates and time charged to Kentucky Power according to each invoice, and a description of the services provided.

7. Provide the following information. If any amounts were allocated, show a calculation of the factor used to allocate each amount.

a. A detailed analysis of charges booked for advertising expenditures during the 12 months preceding the base period. Include a complete breakdown of Account No. 913 – Advertising Expenses, and any other advertising expenditures included in any other expense accounts, as shown in Schedule C1. The analysis should specify the purpose of the expenditure and the expected benefit to be derived.

b. An analysis of Account No. 930 – Miscellaneous General Expenses for the 12 months preceding the base period. Include a complete breakdown of this account as shown in Schedule C2 and provide detailed workpapers supporting this analysis. At a minimum, the analysis should show the date, vendor, reference (i.e., voucher no., etc.), dollar amount, and brief description of each expenditure of \$500 or more, provided that lesser items are grouped by classes as shown in Schedule C2.

c. An analysis of Account No. 426 – Other Income Deductions for the 12 months preceding the base period. Include a complete breakdown of this account as shown in Schedule C3 and provide detailed workpapers supporting this analysis. At a minimum, the analysis should show the date, vendor, reference (i.e., voucher no., etc.), dollar amount, and a brief description of each expenditure of \$500 or more, provided that lesser items are grouped by classes as shown in Schedule C3.

8. Provide an analysis of Kentucky Power's expenses for research and development activities for the base period and the three most recent calendar years. The analysis should include the following:

a. The basis of fees paid to research organizations and Kentucky Power's portion of the total revenue of each organization, including where the contribution is monthly and the current rate and effective date;

b. Details of the research activities conducted by each organization;

c. Details of services and other benefits provided to Kentucky Power by each organization;

d. Annual expenditures of each organization with a basic description of the nature of costs incurred by the organization; and

e. Details of the expected benefits to Kentucky Power.

9. Regarding what are commonly referred to as smart grid initiatives, provide the following information:

a. Identify all smart grid costs Kentucky Power has incurred since the start of the test year utilized in its last general rate case. Identify the specific projects Kentucky Power has undertaken, the accounts in which the costs have been recorded, and state whether the costs were expensed or capitalized.

b. Provide the level of smart grid costs Kentucky Power has included in its forecasted test period and the amounts to be expensed and capitalized.

10. Regarding demand-side management, conservation, and energy-efficiency programs, provide the following:

a. A list of all programs currently offered by Kentucky Power.

b. The total cost incurred for these programs by Kentucky Power in each of the three most recent calendar years.

c. The total energy and demand reductions realized through these programs in each of the three most recent calendar years.

d. The total cost for these programs included in the forecasted test period and the expected energy reductions to be realized therefrom.

11. Provide the following information for the most recent calendar year concerning Kentucky Power and any affiliated service corporation or corporate service division/unit:

a. A schedule detailing the costs charged, either directly or allocated, by Kentucky Power to the service corporation. Indicate Kentucky Power's accounts in

which these costs were originally recorded. For costs that are allocated, include a description of the allocation factors utilized.

b. A schedule detailing the costs charged, either directly or allocated, by the service corporation to Kentucky Power. Identify Kentucky Power's accounts in which these costs were recorded. For costs that are allocated, include a description of the allocation factors utilized.

12. Provide the following information for the most recent calendar year concerning all affiliate-related activities not identified in response to Item 11:

a. Provide the names of affiliates that provided some form of service to Kentucky Power and the type of service Kentucky Power received from each affiliate.

b. Provide the names of affiliates to whom Kentucky Power provided some form of service and the type of service Kentucky Power provided to each affiliate.

c. Identify the service agreement with each affiliate, state whether the service agreement has been previously filed with the Commission and identify the proceeding in which it was filed. Provide each service agreement that has not been previously filed with the Commission.

13. Describe Kentucky Power's lobbying activities and provide a schedule showing the name, salary, and job title of each individual whose job function involves lobbying on the local, state, or national level.

14. Provide the following information concerning the costs for the preparation of this case:

a. A detailed schedule of expenses incurred to date for the following categories:

- (1) Accounting;
- (2) Engineering;
- (3) Legal;
- (4) Consultants; and
- (5) Other Expenses (Identify separately).

b. For each category identified in Item 14a, the schedule should include the date of each transaction, check number or other document reference, the vendor, the hours worked, the rates per hour, amount, a description of the services performed, and the account number in which the expenditure was recorded. Provide copies of contracts or other documentation that support charges incurred in the preparation of this case. Identify any costs incurred for this case that occurred during the base period.

c. An itemized estimate of the total cost to be incurred for this case. Expenses should be broken down into the same categories as identified in Item 14a, with an estimate of the hours to be worked and the rates per hour. Include a detailed explanation of how the estimate was determined, along with all supporting workpapers and calculations.

d. Provide monthly updates of the actual costs incurred in conjunction with this rate case, reported in the manner requested in Items 14a and 14b, and a cumulative total of cost incurred to date for each category. Updates will be due when Kentucky Power files its monthly financial statements with the Commission, through the month of the public hearing.

15. Provide the following information regarding uncollectible accounts for the three most recent calendar years for electric operations:



- a. Reserve account balance at the beginning of the year;
- b. Charges to the reserve account (accounts charged off);
- c. Credits to reserve account;
- d. Current year provision;
- e. Reserve account balance at the end of the year; and
- f. Percent of provision to total revenue.

16. Provide the amount of excess deferred federal income taxes resulting from the reductions in the corporate tax rate in 1986 and 2018, as of the end of the most recent calendar year. Show the amounts associated with each reduction separately

17. Provide the following tax data for the most recent calendar year:

a. Income taxes:

(1) Federal operating income taxes deferred – accelerated tax depreciation.

(2) Federal operating income taxes deferred – other (explain).

(3) Federal income taxes – operating.

(4) Income credits resulting from prior deferrals of federal income taxes.

(5) Investment tax credit net.

(a) Investment credit realized.

(b) Investment credit amortized – Revenue Act of 1971.

(6) The information in Item 17(a)(1–4) for state income taxes.

(7) A reconciliation of book to federal taxable income as shown in Schedule D1 and a calculation of the book federal income tax expense for the base period using book taxable income as the starting point.

(8) A reconciliation of book to state taxable income as shown in Schedule D2 and a calculation of the book state income tax expense for the base period using book taxable income as the starting point.

b. An analysis of Kentucky Other Operating Taxes as shown in Schedule D3.

18. Provide a copy of federal and state income tax returns for the most recent tax year, including supporting schedules.

19. Provide a schedule of franchise fees paid to cities, towns, or municipalities, including the basis of these fees.

20. Provide the journal entries relating to the purchase of utility plant acquired as an operating unit or system by purchase, merger, consolidation, liquidation, or otherwise currently included in rate base. Also, provide a schedule showing the calculation of the acquisition adjustment at the date of purchase for each item of utility plant, the amortization period, and the unamortized balance at the beginning of the base period.

21. Provide Kentucky Power's rate base, capital structure, and statement of income for the most recent 12 months preceding the base period and for the base period. Provide a reconciliation with detailed explanations.

22. Provide the capital structure at the end of the five most recent calendar years and each of the other periods shown in Schedule E1 and Schedule E2.

23. Provide the following:
- a. A list of all outstanding issues of long-term debt as of the end of the latest calendar year together with the related information as shown in Schedule F1.
  - b. An analysis of short-term debt as shown in Schedule F2 as of the end of the latest calendar year.
24. Provide a reconciliation and detailed explanation of each difference, if any, in Kentucky Power's capitalization and net investment rate base for the base period and forecast period.
25. Provide the information shown in Schedule G for each construction project in progress, or planned to be in progress, during the 12 months preceding the base period, the base period, and the forecasted test period.
26. Provide, in the format provided in Schedule H, an analysis of Kentucky Power's Construction Work in Progress (CWIP) as defined in the Uniform System of Accounts for each project identified in Schedule G.
27. Concerning Kentucky Power's construction projects:
- a. For each project started during the last five calendar years, provide the information requested in the format contained in Schedule I1. For each project, include the amount of any cost variance and delay encountered, and explain in detail the reasons for such variances and delays.
  - b. Using the data included in Schedule I1, calculate the annual "Slippage Factor" associated with those construction projects. The Slippage Factor should be calculated as shown in Schedule I2.

c. In determining the capital additions reflected in the base period and forecasted test period, explain whether Kentucky Power recognized a Slippage Factor.

28. Describe in detail how the base period capitalization rate was determined. If different rates were used for specific expenses (i.e., payroll, clearing accounts, depreciation, etc.), indicate the rate and how it was determined. Indicate all proposed changes to the capitalization rate and how the changes were determined.

29. Provide a calculation of the rate or rates used to capitalize interest during construction for the three most recent calendar years. Explain each component entering into the calculation of the rate(s).

30. State whether any changes have been made to Kentucky Power's internal accounting manuals, directives, and policies and procedures since Kentucky Power's most recent rate case. If so, provide each item that was changed and identify the changes.

31. Provide Kentucky Power's long-term construction planning program.

32. Provide a copy of Kentucky Power's most recent depreciation study. If no such study exists, provide a copy of Kentucky Power's most recent depreciation schedule. The schedule should include a list of all facilities by account number, service life and accrual rate for each plant item, the methodology that supports the schedule, and the date the schedule was last updated.

33. For each of the following Accounting Standards Codification (ASC), provide the information listed concerning implementation by Kentucky Power.

a. ASC 410-20, "Asset Retirement Obligations."

(1) The effect on the financial statements.

(2) Whether the base period or forecasted test period includes any impact of the implementation. If so, provide a detailed description of the impact.

b. A schedule comparing the depreciation rates utilized by Kentucky Power prior to and after the adoption of ASC 410-20. The schedule should identify the assets corresponding to the affected depreciation rates.

c. ASC 715-20, "Defined Benefit Plans - General."

(1) The effect on the financial statements.

(2) Whether the test period includes any impact of the implementation. If so, provide a detailed description of the impact.

34. Provide a complete description of Kentucky Power's Other Post-Employment Benefits package(s) provided to its employees.

35. Provide a complete description of the financial reporting and ratemaking treatment of Kentucky Power's pension costs.

36. Provide detailed descriptions of all early retirement plans or other staff reduction programs Kentucky Power has offered or intends to offer its employees during either the base period or the forecasted test period. Include all cost-benefit analyses associated with these programs.

37. Provide all current labor contracts and the most recent labor contracts previously in effect.

38. Provide the information requested in Schedule J for budgeted and actual numbers of full- and part-time employees, regular wages, overtime wages, and total wages by employee group, by month, for the three most recent calendar years, the test year. Explain any variance exceeding 5 percent.

39. For each employee group, state the amount, percentage increase, and effective dates for general wage increases and, separately, for merit increases granted or to be granted in the past two calendar years and the test year.

40. For the base period and three most recent calendar years, provide a schedule reflecting the job title, duties and responsibilities of each executive officer, the number of employees who report to each officer, and to whom each officer reports, and the percentage annual increase and the effective date of each increase. For employees elected to executive officer status since the test year in Kentucky Power's most recent rate case, provide the salaries for the persons they replaced.

41. Provide, in the format provided in Schedule K, the following information for Kentucky Power's compensation and benefits, for the three most recent calendar years and the test year. Provide the information individually for each corporate officer and by category for Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly. Provide the amounts, in gross dollars, separately for total company operations and jurisdictional operations.

- a. Regular salary or wages.
- b. Overtime pay.
- c. Excess vacation payout.
- d. Standby/Dispatch pay.
- e. Bonus and incentive pay.
- f. Any other forms of incentives, including stock options or forms of deferred compensation (specify).
- g. Other amounts paid and reported on the employees' W-2 (specify).

- h. Healthcare benefit cost.
  - (1) Amount paid by Kentucky Power.
  - (2) Amount paid by the employee.
- i. Dental benefits cost.
  - (1) Amount paid by Kentucky Power.
  - (2) Amount paid by the employee.
- j. Vision benefits cost.
  - (1) Amount paid by Kentucky Power.
  - (2) Amount paid by the employee.
- k. Life insurance cost.
  - (1) Amount paid by Kentucky Power.
  - (2) Amount paid by the employee.
- l. Accidental death and disability benefits.
  - (1) Amount paid by Kentucky Power.
  - (2) Amount paid by the employee.
- m. Defined Benefit Retirement cost.
  - (1) Amount paid by Kentucky Power.
  - (2) Amount paid by the employee.
- n. Defined Contribution – 401(k) or similar plan cost. Provide the amount paid by Kentucky Power.
- o. Cost of any other benefit available to an employee, including fringe benefits (specify).

42. For each benefit listed in Item 41 above for which an employee is required to pay part of the cost, provide a detailed explanation as to how the employee contribution rate was determined.

43. Provide a listing of all health care plan categories, dental plan categories, and vision plan categories available to corporate officers individually and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees (e.g., single, family, etc.). Include the associated employee contribution rates and employer contribution rates of the total premium cost for each category, and each plan's deductible(s) amounts.

44. Provide each medical insurance policy that Kentucky Power currently maintains.

45. Provide a listing of all life insurance plan categories available to corporate officers individually and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees. Include the associated employee contribution rates and employer contribution rates of the total premium cost for each plan category.

46. Provide a listing of all retirement plans available to corporate officers individually and to groups defined as Directors, Managers, Supervisors, Exempt, Non-Exempt, Union, and Non-Union Hourly employees. Include the associated employee contribution rates, if any, and employer contribution rates of the total cost for each plan category.

47. Concerning employee fringe benefits:



a. Provide a detailed list of all fringe benefits available to Kentucky Power's employees. Indicate any fringe benefits that are limited to management employees.

b. Provide comparative cost information for the 12 months preceding the test year and the test year. Explain any changes in fringe benefits occurring over this 24-month period.

48. State whether Kentucky Power, through an outside consultant or otherwise, performed a study or survey to compare its wages, salaries, benefits, and other compensation to those of other utilities in the region, or to other local or regional enterprises.

a. If comparisons were performed, provide the results of the study or survey, including all workpapers and discuss the results of such comparisons. State whether any adjustments to wages, salaries, benefits, and other compensation in the rate application are consistent with the results of such comparisons.

b. If comparisons were not performed, explain why such comparisons were not performed.

49. Regarding Kentucky Power's employee compensation policy:

a. Provide Kentucky Power's written compensation policy as approved by the board of directors.

b. Provide a narrative description of the compensation policy, including the reasons for establishing the policy and Kentucky Power's objectives for the policy.

c. Explain whether the compensation policy was developed with the assistance of an outside consultant. If the compensation policy was developed or reviewed by a consultant, provide any study or report provided by the consultant.

d. Explain when Kentucky Power's compensation policy was last reviewed or given consideration by the board of directors.

e. Explain whether Kentucky Power's expenses for wages, salaries, benefits, and other compensation included in the test period and any adjustments to the test year, are compliant with the board of director's compensation policy.

50. To the extent not provided in the responses above, provide all wage, compensation, or employee benefits studies, analyses, or surveys conducted since Kentucky Power's last rate case or that are currently utilized by Kentucky Power.

51. Provide the average number of customers on Kentucky Power's system (actual and projected), by rate schedule, for the base period and the three most recent calendar years.

52. Provide a schedule, in the format provided in Schedule L, of electric operations net income, per kWh sold, per company books for the base period and the three calendar years preceding the base period.

53. Provide, in the format provided in Schedule M, comparative operating statistics for electric operations.

54. To the extent not already provided, provide a copy of each cost of service study, billing analysis, and all exhibits and schedules that were prepared in Kentucky Power's rate application in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

55. To the extent not already provided, provide all workpapers, calculations, and assumptions Kentucky Power used to develop its forecasted test period financial information in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

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Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED **AUG 14 2025**

cc: Parties of Record

Case No. 2025-00257

KENTUCKY POWER COMPANY  
Case No. 2025-00257

### Comparison of Revenue Account Balances With Those of the Preceding 12 months

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KENTUCKY POWER COMPANY  
Case No. 2025-00257

Analysis of Professional Services Expenses  
For the 12 Months Ended \_\_\_\_\_

Line No.	Item (a)	Rate Case (b)	Annual Audit (c)	Other (d)	Total (e)
1.	Legal				
2.	Engineering				
3.	Accounting				
4.	Other				
5.	Total				

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Analysis of Advertising Expenses  
(Including Account No. 913)  
For the 12 Months Ended \_\_\_\_\_

Line No.	Item (a)	Sales or Promotional Advertising (b)	Institutional Advertising (c)	Conservation Advertising (d)	Rate Case (e)	Other (f)	Total (g)
1.	Newspaper						
2.	Magazines and Other						
3.	Television						
4.	Radio						
5.	Direct Mail						
6.	Sales Aids						
7.	Total						
8.	Amount Assigned to Kentucky Jurisdictional						

Note: Specify the purpose of the expenditures and the expected benefit to be derived.

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Analysis of Account No. 930 – Miscellaneous General Expenses  
For the 12 Months Ended \_\_\_\_\_

Line No.	Item (a)	Amount (b)
1.	Industry Association Dues	
2.	Stockholder and Debt Service Expenses	
3.	Institutional Advertising	
4.	Conservation Advertising	
5.	Rate Department Load Studies	
6.	Director's Fees and Expenses	
7.	Dues and Subscriptions	
8.	Miscellaneous	
9.	Total	
10.	Amount Assigned to Kentucky Jurisdictional	

Note: Include detailed workpapers supporting this analysis. Expenditures under \$500 are to be grouped by the classes shown on this Schedule.



KENTUCKY POWER COMPANY  
Case No. 2025-00257

Analysis of Account No. 426 – Other Income Deductions  
For the 12 Months Ended \_\_\_\_\_

Line No.	Item (a)	Amount (b)
1.	Donations	
2.	Civic Activities	
3.	Political Activities	
4.	Other	
5.	Total	

Note: Include detailed workpapers supporting this analysis. Expenditures under \$500 are to be grouped by the classes shown on this Schedule.

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Reconciliation of Book Net Income and Federal Taxable Income  
12 Months Ended December 31, \_\_\_\_\_

Line No.	Item (a)	Total Company (b)	Total Company Non-Operating (c)	Operating	
				Kentucky Retail (d)	Other Jurisdictional (e)
1.	Net income per books				
2.	Add income taxes:				
3.	Federal income tax – current				
4.	Federal income tax – deferred depreciation				
5.	Federal income tax – deferred other				
6.	Investment tax credit adjustment				
7.	Federal income taxes charged to other income and deductions				
8.	State income taxes				
9.	State income taxes charged to other income and deductions				
10.	Total				
11.	Flow through items:				
12.	Add (itemize)				
13.	Deduct (itemize)				
14.	Book taxable income				
15.	Differences between book taxable income and taxable income per tax return:				
16.	Add (itemize)				
17.	Deduct (itemize)				
18.	Taxable income per return				

Note: (1) Provide a calculation of the amount shown on Lines 3 through 7 above.  
 (2) Provide workpapers supporting each calculation including the depreciation for straight-line tax and accelerated tax depreciation.  
 (3) Provide a schedule setting forth the basis of allocation of each item of revenue or cost above.

KENTUCKY POWER COMPANY  
Case No. 2025-00257  
Reconciliation of Book Net Income and State Taxable Income  
12 Months Ended December 31, \_\_\_\_\_

Line No.	Item (a)	Total Company (b)	Total Company Non-Operating (c)	Operating	
				Kentucky Retail (d)	Other Jurisdictional (e)
1.	Net income per books				
2.	Add income taxes:				
3.	Federal income tax – current				
4.	Federal income tax – deferred depreciation				
5.	Federal income tax – deferred other				
6.	Investment tax credit adjustment				
7.	Federal income taxes charged to other income and deductions				
8.	State income taxes				
9.	State income taxes charged to other income and deductions				
10.	Total				
11.	Flow through items:				
12.	Add (itemize)				
13.	Deduct (itemize)				
14.	Book taxable income				
15.	Differences between book taxable income and taxable income per tax return:				
16.	Add (itemize)				
17.	Deduct (itemize)				
18.	Taxable income per return				

Note: (1) Provide a calculation of the amount shown on Lines 3 through 7 above.  
 (2) Provide workpapers supporting each calculation including the depreciation for straight-line tax and accelerated tax depreciation.  
 (3) Provide a schedule setting forth the basis of allocation of each item of revenue or cost allocated above.

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Analysis of Other Operating Taxes  
12 Months Ended December 31, \_\_\_\_\_

“000 Omitted”

Line No.	Item (a)	Charged Expense (b)	Charged to Construction (c)	Charged to Other Accounts <sup>(1)</sup> (d)	Amounts Accrued (e)	Amount Paid (f)
1.	Kentucky Retail					
	(a) State income					
	(b) Franchise fees					
	(c) Ad valorem					
	(d) Payroll (employer's portion)					
	(e) Other taxes					
2.	Total Retail [L1(a) through L1(e)]					
3.	Other jurisdictions					
	Total per books (L2 and L3)					

(1) Explain items in this Column.

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Calculation of Average Capital Structure  
12 Months Ended \_\_\_\_\_

“000 Omitted”

Line No.	Type of Capital	5 <sup>th</sup> Year		4 <sup>th</sup> Year		3 <sup>rd</sup> Year		2 <sup>nd</sup> Year		1 <sup>st</sup> Year		Latest Available Quarter	
		Amount	Ratio	Amount	Ratio	Amount	Ratio	Amount	Ratio	Amount	Ratio	Amount	Ratio
1.	Long-Term Debt												
2.	Short-Term Debt												
3.	Preferred & Preference Stock												
4.	Common Equity												
5.	Other (Itemize by type)												
6.	Total Capitalization												

Instructions: If the applicant is a member of an affiliated group, the above data is to be provided for the parent company and the system consolidated.

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Calculation of Average Capital Structure  
12 Months Ended December 31, \_\_\_\_\_

"000 Omitted"

Line No.	Item (a)	Total Capital (b)	Long-Term Debt (c)	Short-Term Debt (d)	Preferred Stock (e)	Common Stock (f)	Retained Earnings (g)	Total Common Equity (h)
1.	Balance at beginning of most recent calendar year							
2.	1 <sup>st</sup> Month							
3.	2 <sup>nd</sup> Month							
4.	3 <sup>rd</sup> Month							
5.	4 <sup>th</sup> Month							
6.	5 <sup>th</sup> Month							
7.	6 <sup>th</sup> Month							
8.	7 <sup>th</sup> Month							
9.	8 <sup>th</sup> Month							
10.	9 <sup>th</sup> Month							
11.	10 <sup>th</sup> Month							
12.	11 <sup>th</sup> Month							
13.	12 <sup>th</sup> Month							
14.	Total (L1 through L13)							
15.	Average Balance (L14 / 13)							
16.	Average Capitalization Ratios							
17.	End-of-period Capitalization Ratios							

- Instructions:
1. If applicable, provide an additional schedule in the above format excluding common equity in subsidiaries from the total company capital structure. Show the amount of common equity excluded.
  2. Include premium class of stock.

KENTUCKY POWER COMPANY  
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Schedule of Outstanding Long-Term Debt  
For the Year Ended December 31, \_\_\_\_\_

Line No.	Type of Debt Issue (a)	Date of Issue (b)	Date of Maturity (c)	Amount Outstanding (d)	Coupon Interest Rate <sup>(1)</sup> (e)	Cost Rate at Issue <sup>(2)</sup> (f)	Cost Rate at Maturity <sup>(3)</sup> (g)	Bond Rating at Time of Issue <sup>(4)</sup> (h)	Type of Obligation (i)	Annualized Cost Col. (d) x Col. (g) (j)
<p>Total Long-Term Debt and Annualized Cost</p> <p>Annualized Cost Rate [Total Col. (j) / Total Col. (d)]</p>										

- \_\_\_\_\_
- (1) Nominal Rate
  - (2) Nominal Rate plus Discount or Premium Amortization
  - (3) Nominal Rate plus Discount or Premium Amortization and Issuance Cost
  - (4) Standard and Poor's, Moody, etc.

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Schedule of Short-Term Debt  
For the 12 Months Ended December 31, \_\_\_\_\_

Line No.	Type of Debt Instrument (a)	Date of Issue (b)	Date of Maturity (c)	Amount Outstanding (d)	Nominal Interest Rate (e)	Effective Interest Rate (f)	Annualized Interest Cost Col. (f) x Col. (d) (g)
Total Short-Term Debt							
Annualized Cost Rate [Total Col. (g) / Total Col. (d)]							
Actual Interest Paid or Accrued on Short-Term Debt During the Test Year [Report in Col. (g) of this Schedule]							
Average Short-Term Debt – Schedule E2 Line 15 Col. (d) [Report in Col. (g) of this Schedule]							
Test-Year Interest Rate [Actual Interest / Average Short-Term Debt] [Report in Col. (f) of this Schedule]							

Note: In all instances in which the Effective Interest Rate is different from the Nominal Interest Rate, provide a calculation of the Effective Interest Rate in sufficient detail to show the items of costs which cause the difference.



Construction Projects  
As of \_\_\_\_\_

\*Explain the nature of all other indirect costs in footnotes.

KENTUCKY POWER COMPANY  
Case No. 2025-00257  
Construction Work in Progress – Percent Complete\*  
As of \_\_\_\_\_

Line No. (A)	Project No. (B)	Date Construction Work Began (C)	Estimated Project Completion Date (D)	Percent of Elapsed Time (E)	Original Budget Estimate (F)	Most Recent Budget Estimate (G)	Total Project Expenditures (H)	Percent of Total Expenditures (I) = (G/H)
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\$ \$ \$

\* Should be based on expenditures including AFUDC.

Construction Projects  
For 5 Years Ended December 31, \_\_\_\_\_

Project No.	Project Title/Description	Annual Actual Cost	Annual Original Budget	Variance in Dollars	Variance as Percent	Percent of Budget	Total Actual Project Cost	Total Budget Project Cost	Variance in Dollars	Date Original Budget Start	Date Original Budget End	Date Actual Start	Date Actual End

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Calculation of Capital Construction Project Slippage Factor

Source:      Schedule I1 – Construction Projects

Year	Annual Actual Cost	Annual Original Budget	Variance in Dollars	Variance as Percent	Slippage Factor
1					
2					
3					
4					
5					
Totals					
5 Year Average Slippage Factor (Mathematic Average of the Yearly Slippage Factors / 5 years)					

The Annual Actual Cost, Annual Original Budget, Variance in Dollars, and Variance as Percent are to be taken from Schedule I1. Total all projects for a given year.

The Slippage Factor is calculated by dividing the Annual Actual Cost by the Annual Original Budget. Calculate a Slippage Factor for each year and the Totals line. Carry Slippage Factor percentages to 3 decimal places.

KENTUCKY POWER COMPANY

Case No. 2025-00257  
Monthly Payroll Variance Analysis  
As of \_\_\_\_\_

Workpaper Reference No.(s): \_\_\_\_

Month.	Employee Group	Number of Full-Time Employees		Number of Part-Time Employees		Monthly Budget			Monthly Actual			Variance Percent		
		Budgeted	Actual	Budgeted	Actual	Reg.	OT	Total	Reg.	OT	Total	Reg.	OT	Total

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Analysis of Compensation and Benefit Data, in gross dollars  
For the 12 Months Ended \_\_\_\_\_

Employee Categories	Compensation by Category <sup>(1)</sup>	Subtotal All Compensation	Benefit Type <sup>(2)</sup>		Defined Contribution Plan – Utility Contribution	Other <sup>(3)</sup>	Total Compensation and Benefits	
			Utility	Employee			Utility	Employee
<b>Corporate Officers (Individually)</b>								
Total Amount								
Total KY Jurisdictional								
<b>Corporate Officers (Collectively)</b>								
Total Amount								
Total KY Jurisdictional								
<b>All Other Employee Categories (Separate by Category)<sup>(4)</sup></b>								
Total Amount								
Total KY Jurisdictional								
<b>Total for All Categories</b>								
Total Amounts								
Total KY Jurisdictional								

(1) Specify as directed in Item 41. Use additional columns as necessary.

(2) Specify as directed in Item 41. Use additional columns as necessary. Provide utility and Employee contributions for each benefit type.

(3) Specify. Use additional columns as necessary.

(4) Specify as directed in Item 41. Use additional rows as necessary. Provide total company and jurisdictional operations separately for each category.

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Net Income per kWh Sold  
For the Calendar Years \_\_\_\_\_ through \_\_\_\_\_  
And for the Base Period \_\_\_\_\_

“000 Omitted”

Line No.	Item (a)	12 Months Ended			
		Three Most Recent Calendar Years			Base Period (e)
		3 <sup>rd</sup> (b)	2 <sup>nd</sup> (c)	1 <sup>st</sup> (d)	
1.	OPERATING INCOME				
2.	Operating Revenues				
3.	OPERATING INCOME DEDUCTIONS				
4.	Operating and Maintenance Expenses:				
5.	Power Production Expenses				
6.	Purchased Power Expenses				
7.	Transmission Expenses				
8.	Distribution Expenses				
9.	Customer Accounts Expenses				
10.	Customer Service and Informational Expenses				
11.	Sales Expenses				
12.	Administrative and General Expenses				
13.	Total (L5 through L12)				
14.	Depreciation Expenses				
15.	Amortization of Utility Plant Acquisition Adjustment				
16.	Taxes Other Than Income Taxes				
17.	Income Taxes – Federal				
18.	Income Taxes – Other				
19.	Provision for Deferred Income Taxes				
20.	Investment Tax Credit Adjustment – Net				
21.	Total Utility Operating Expenses				
22.	Net Utility Operating Income				

KENTUCKY POWER COMPANY  
Case No. 2025-00257

Net Income per kWh Sold  
For the Calendar Years \_\_\_\_\_ through \_\_\_\_\_  
And for the Base Period \_\_\_\_\_

“000 Omitted”

Line No.	Item (a)	12 Months Ended			
		Three Most Recent Calendar Years			Base Period (e)
		3 <sup>rd</sup> (b)	2 <sup>nd</sup> (c)	1 <sup>st</sup> (d)	
23.	OTHER INCOME AND DEDUCTIONS				
24.	Other Income:				
25.	NON-UTILITY OPERATING INCOME				
26.	Equity in Earnings of Subsidiary Company				
27.	Interest and Dividend Income				
28.	Allowance for Funds Used During Construction				
29.	Miscellaneous Non-operating Income				
30.	Gain on Disposition of Property				
31.	Total Other Income				
32.	Other Income Deductions:				
33.	Loss on Disposition of Property				
34.	Miscellaneous Income Deductions				
35.	Taxes Applicable to Other Income and Deductions:				
36.	Income Taxes and Investment Tax Credits				
37.	Taxes Other Than Income Taxes				
38.	Total Taxes on Other Income and Deductions				
39.	Net Other Income and Deductions				
40.	INTEREST CHARGES				
41.	Interest on Long-Term Debt				
42.	Interest on Short-Term Debt				
43.	Amortization of Premium on Debt – Credit				
44.	Other Interest Expense				
45.	Total Interest Charges				
46.	Net Income				
47.	kWh Sold				



KENTUCKY POWER COMPANY  
Case No. 2025-00257

Comparative Operating Statistics – Electric Operations  
For the Calendar Years \_\_\_\_\_ through \_\_\_\_\_

(Total Company)

Line No.	Item (a)	Three Most Recent Calendar Years					
		3 <sup>rd</sup> Year		2 <sup>nd</sup> Year		1 <sup>st</sup> Year	
		Cost (b)	% Inc. (c)	Cost (d)	% Inc. (e)	Cost (f)	% Inc. (g)
1.	Cost per kWh of Electricity Generated						
2.	Cost per kWh of Electricity Purchased						
3.	Cost per kWh of Electricity Sold						
4.	Maintenance Cost per Transmission Mile						
5.	Maintenance Cost per Distribution Mile						
6.	Sales Promotion Expense per Customer						
7.	Administration and General Expense per Customer						
8.	Wages and Salaries – Charged Expense – per Average Employee						
9.	Depreciation Expense:						
10.	Per \$100 of Average Gross Depreciable Plant in Service						
11.	Rents:						
12.	Per \$100 of Average Gross Plant in Service						
13.	Property Taxes:						
14.	Per \$100 of Average Net Plant in Service						
15.	Payroll Taxes:						
16.	Per Average Employee whose Salary is Charged to Expense						
17.	Interest Expense:						
18.	Per \$100 of Average Debt Outstanding						
19.	Per \$100 of Average Plant Investment						
20.	Per kWh Sold						
21.	Meter Reading Expense per Meter						

\*Angela M Goad  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Kenneth J Gish, Jr.  
Stites & Harbison  
250 West Main Street, Suite 2300  
Lexington, KY 40507

\*Hector Garcia  
Kentucky Power Company  
1645 Winchester Avenue  
Ashland, KY 41101

\*Katie M Glass  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KY 40602-0634

\*Harlee P. Havens  
Stites & Harbison  
250 West Main Street, Suite 2300  
Lexington, KY 40507

\*Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Jennifer L. Parrish  
Kentucky Power Company  
1645 Winchester Avenue  
Ashland, KY 41101

\*Michael West  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Jeffery D. Newcomb  
Kentucky Power Company  
1645 Winchester Avenue  
Ashland, KY 41101

\*Michael J. Schuler  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Post Office Box 16631  
Columbus, OH 43216

\*John Horne  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KY 40601-8204

\*Toland Lacy  
Office of the Attorney General  
700 Capital Avenue  
Frankfort, KY 40601

\*Kentucky Power Company  
1645 Winchester Avenue  
Ashland, KY 41101

\*Tanner Wolfram  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Post Office Box 16631  
Columbus, OH 43216