

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LARRY AND DEBRA PETERMAN	)	
	)	
COMPLAINANT	)	
	)	CASE NO.
V.	)	2025-00027
	)	
KENTUCKY POWER COMPANY	)	
	)	
DEFENDANT	)	

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 May 2, 2025. 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 representatives of a public or private corporation or a partnership or association or a

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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).

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 a list of all telephone calls, written communications and on-site visits made by Kentucky Power personnel to the Peterman's residence at 51 Woodland Way, Grayson, Kentucky 41143, prior to the September 3, 2024 visit listed in response to the Commission's February 12, 2025 Order. Identify the purpose of each communication,

the persons involved and provide a summary as well as all documentation of same.

2. Provide evidence, including information, documentation and metadata that demonstrates that the photograph sent to Kentucky Power personnel on or around September 12, 2024, was taken in February 2024.<sup>2</sup>

3. Provide all documentation, including date stamps, supporting Kentucky Power's claim that they removed the two hot legs and neutral wires leading to the residence at Kentucky Power's pole.

4. Describe the size and type of service neutral wire Kentucky Power typically uses to divert voltage at a residence.

5. Explain whether the size and type of service neutral wiring change depending on the type of property served or the amount of electricity used.

6. Refer to Kentucky Power's tariff sheets P.S.C. Ky. No. 13 Original Sheet 2-5 to 2-7. Confirm that even though customer has offered to pay for replacement of the ground wire as if installing for new construction, Kentucky Power is refusing to replace the ground wires. If confirmed, provide the tariff provision allowing Kentucky Power to decline to replace the ground wire.

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<sup>2</sup> Case No. 2025-00027, *Larry and Debra Peterman v. Kentucky Power Company* (filed Feb. 24, 2025), Kentucky Power Company Response to Commission Order and Motion to Dismiss at 4.

*Linda Bridwell* *PP*

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

DATED APR 14 2025

cc: Parties of Record

Case No. 2025-00027

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

\*Larry Peterman  
51 Woodland Way  
Grayson, KY 41143