

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR AN ORDER	)	
APPROVING ACCOUNTING PRACTICES TO	)	
ESTABLISH A REGULATORY ASSET RELATED	)	CASE NO.
TO THE EXTRAORDINARY EXPENSES	)	2025-00291
INCURRED BY KENTUCKY POWER COMPANY	)	
IN CONNECTION WITH SEVERAL SEVERE	)	
STORMS FROM FEBRUARY THROUGH MAY	)	
2025	)	

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 September 30, 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. Refer to the Application, Item 7 on page 3. Provide an explanation for why storms not classified as a "Major Event Days" should be given regulatory asset treatment as an extraordinary and sufficiently significant, nonrecurring expense.

2. Refer to the Application, Exhibit 2. Provide a breakdown of the estimated costs for each of the other contractors used in response to the February 11, March 31, April 3-4, and May 1-3, 2025 storms.

3. From January 1, 2025, through August 31, 2025, provide:

a. Storm damage operating and maintenance expenses.

b. For each expense identified in response to 3. a., provide the related Commission case number.

4. Refer to the Application, Items 25, 33, 41, 49, and 57, which states preliminary records for expected damages. Confirm the following equipment is still the most recent listing for damages due to the listed storm. If not confirmed, explain why. Also, provide an approximate age of the equipment damaged, by type of equipment.:

a. Confirm six transformers, 10 sets of cross arms, 14 broken poles, and 59 spans of conductor were damaged due to the February 11, 2025, storm.

b. Confirm four transformers, 11 broken poles, 18 sets of cross arms, and 72 spans of conductor were damaged due to the March 31, 2025 storm.

c. Confirm seven transformers, seven sets of cross arms, 15 broken poles and 117 spans of conductor were damaged due to the April 3-4, 2025 storm.

d. Confirm four cross arms, six transformers, 11 broken poles, and 52 spans of wire were damaged due to the May 1-3, 2025 storm.

e. Confirm two set of cross arms, four transformers, nine broken poles, and 79 spans of conductor were damaged due to the May 20-21, 2025 storm.

5. Explain how Kentucky Power determines when to seek a regulatory asset for storm or other weather-related expenses, including any monetary or asset thresholds.

6. Explain what efforts Kentucky Power is taking to harden its distribution and transmission systems from storm or other weather related damage.

7. Refer to the Application, page 14, paragraph 71.

a. Explain whether using Incident Command System mitigates cost associated with storm repair.

8. Refer to the Application, page 13, paragraph 65.

a. Provide the Edison Electric Institute governing principles for emergency assistance.

b. Explain whether Edison Electric Institute principles is the standard that is utilized by American Electric Power (AEP).

9. Refer to Case No. 2023-00159,<sup>2</sup> January 19, 2024 Order.

a. Confirm that the level of total distribution major and non-major storm project expense used in the 12-month period ending March 31, 2023, was \$7.3 million. If not confirmed, provide the correct amount.

b. Refer also to the present case, Application, page 5, paragraphs 12 and 13. All else being equal, confirm that if Kentucky Power had established a higher distribution major and non-major storm project expense of \$7.3 million in base rates, that “a large portion of the costs sought to be deferred in this Application would have been recovered through base rates, and there would have been a lesser effect on the Company’s financial condition.” If not confirmed, explain why not.

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<sup>2</sup> Case No. 2023-00159, *Electronic Application of Kentucky Power Company for (2) A General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities (4) A Securitization Financing Order; and (5) All Other Required Approvals and Relief* (Ky. PSC Jan. 19, 2024), Order.

10. Refer to the Application, paragraph 7. Explain whether Kentucky Power has previously sought and received approval for regulatory asset treatment that did not exceed the threshold for Major Event Days.



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Linda C. Bridwell, PE  
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Public Service Commission  
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DATED **SEP 22 2025**

cc: Parties of Record

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