

Public Comments Received for Case Number: 2026-00159  
Response Monday, July 27, 2026

Your comments in the above referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2026-00159 in any further correspondence.

The documents in this case are available at: [View Case Filings for: 2026-00159 \(ky.gov\)](#).

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Received through Public Comments

Friday, July 17, 2026

From: Mary Cromer  
City: Whitesburg  
State: KY  
Zip: 41858

Comments:  
Dear Commissioners,

Appalachian Citizens' Law Center, Inc. and Kentuckians For The Commonwealth submit this request for a public scoping process to inform the scope of the audit conducted as part of case number 2026-00159. We believe that Kentucky Power's ratepayers have specific information and questions about Kentucky Power's managerial and operating practices that would be appropriate to include in the scope of the ordered audit. Furthermore, we believe that considering the circumstances facing Kentucky Power's customers, who are the victims in the company's "death spiral", it is imperative to give them this opportunity to shape the audit by providing the Commission with specific information and questions to consider.

We recognize that the statute and regulations provide only skeletal guidance on how the audit process is to be carried out. We also recognize that in past audits, the Commission has emphasized that it is essential that audits be conducted in a non-adversarial way. We are further cognizant of the need to provide a manageable process that allows the audit to proceed to its resolution quickly. We believe that including a public scoping process will provide a mechanism by which the public's concerns can be addressed without triggering an adversarial process and needlessly drawing out the proceeding.

We believe that the public scoping process will add to the topics that have already been raised in other Kentucky Power cases. Specifically, the Attorney Generals Office of Rate Intervention, in its post-hearing brief in Case No. 2025-00257, identified specific topics warranting audit scrutiny — including the effect of poor resource planning on rates, historic underinvestment in distribution, whether Kentucky Powers transmission obligations effectively subsidize other AEP ratepayers, options for near- and long-term rate relief, and who actually makes decisions for Kentucky Power and whether those decisions are unreasonably influenced by its corporate parent. See Case No. 2025-00257, Attorney Generals Post-Hearing Brief at 18 (filed Feb. 3, 2026). The ongoing record in Case No. 2025-00365, Kentucky Powers application to continue its Demand-Side Management programs, has also surfaced comparable managerial concerns, including inadequate oversight of third-party program administrators. See Case No. 2025-00365, Direct Testimony of Stacy Sherwood on Behalf of Joint Intervenors (filed Mar. 18, 2026).

We specifically ask that the Commission enter an order in the case that invites the public to use the existing public comment portal to submit information and questions that they believe should be considered within the scope of the ordered audit. The order could specify that comments will be submitted for this purpose for no more than 60 days, after which Commission staff could work to collate the comments such that the matters raised are included in the Request for Proposals sent pursuant to KRS 278.255 and 807 KAR 5:013.

Thank you for your consideration.

Respectfully Submitted,

Mary Varson Cromer

## Service List for 2026-00159

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