COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER COMPANY FOR (1) AUTHORITY TO MODIFY CERTAIN EXISTING DEMAND-SIDE MANAGEMENT PROGRAMS; (2) AUTHORITY TO IMPLEMENT NEW PROGRAMS; (3) AUTHORITY TO DISCONTINUE CERTAIN EXISTING DEMAND-SIDE MANAGEMENT PROGRAMS; (4) AUTHORITY TO RECOVER COSTS AND NET LOST REVENUES, AND TO RECEIVE INCENTIVES ASSOCIATED WITH THE IMPLEMENTATION OF THE PROGRAMS; AND (5) ALL OTHER REQUIRED APPROVALS AND RELIEF	)	CASE NO. 2015-00271

ORDER

On September 15, 2015, Kentucky Power Company ("Kentucky Power") filed an application pursuant to KRS 278.285 to modify five of its existing Demand-Side Management ("DSM") residential programs (Residential Efficient Products, Appliance Recycling Program, Targeted Energy Efficiency Program, Energy Education for Students, and Community Outreach CFL Program); discontinue four DSM residential programs (Mobile Home New Construction, Modified Energy Fitness, High Efficiency Heat Pump, and Mobile Home High Efficiency Heat Pump Programs) and replace them with two new programs (New Manufactured Home and Whole House Efficiency); and discontinue two commercial programs (Commercial Incentive and Small Commercial HVAC) and replace them with three new programs (Commercial Incentive Prescriptive Program, Commercial Express Install, and Commercial New Construction).[1] It also

[1] Application, Direct Testimony of John A. Rogness, III ("Rogness Testimony") at 19.

requested that the Commission approve recovery through Kentucky Power's DSM surcharge of its full costs, including lost revenues and incentives, associated with its existing, modified, and proposed programs through December 31, 2018. Kentucky Power further requested approval of its DSM Status Report,[2] the corresponding tariffs,[3] and the proposed residential and commercial DSM surcharges.[4] Kentucky Power's DSM Collaborative had no objections to the proposed modifications to Kentucky Power's DSM portfolio, with the exception of the Attorney General's Office and the Sierra Club, both of which abstained from voting on Kentucky Power's existing and proposed DSM programs.[5]

Pursuant to the Commission's Order dated September 24, 2015, a procedural schedule was established and the proposed effective date of Kentucky Power's DSM tariffs was suspended for five months, from October 29, 2015, up to and including March 28, 2016. The procedural schedule provided for, among other things, two rounds of discovery upon Kentucky Power's application, an opportunity for the filing of intervenor testimony, and discovery on intervenor testimony.

The only intervenors in this proceeding are Beverly May and the Sierra Club (collectively, "Sierra Club"). Kentucky Power responded to two requests for information from Commission Staff and from the Sierra Club. The Sierra Club also provided written comments.

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[2] *Id.*, Exhibit 2.

[3] *Id.*, Exhibit 7.

[4] *Id.*, Exhibit 3.

[5] *Id.* at 19.

On December 28, 2015, Kentucky Power filed a formal request that the matter be submitted for a decision on the evidentiary record and notified the Commission that it would not be filing responsive comments to those filed by the Sierra Club. The Commission finds that a formal hearing is not necessary, in the public interest, or for the protection of substantial rights. We will, therefore, grant Kentucky Power's request, and the instant matter is now submitted for a decision based upon the evidentiary record.

KENTUCKY POWER'S DSM PROGRAMS

Kentucky Power's current DSM portfolio was approved in Case No. 2014-00271[6] and consists of the following 13 programs:

1. Targeted Energy Efficiency Program;
2. Modified Energy Fitness Program;
3. Energy Education for Students Program;
4. Community Outreach CFL Program;
5. Residential Efficient Products Program;
6. High Efficiency Heat Pump Program;
7. Mobile Home High Efficiency Heat Pump Program;
8. Mobile Home New Construction Program;
9. Residential Home Performance;
10. Appliance Recycling;
11. Small Commercial High Efficiency Heat Pump/Air Conditioner Program;

[6] Case No. 2014-00271, *Application of Kentucky Power Company for (1) Re-Authorization of Certain of Its Existing Programs; (2) Authority to Discontinue the Commercial and Residential HVAC Diagnostic and Tune-Up Programs; (3) Authority to Amend Its Demand-Side Management Program to Implement Residential Home Performance and Residential Appliance Recycling Programs; (4) Authority to Recover Costs and Net Lost Revenues and to Receive Incentives Associated with the Implementation of the Programs; and (5) All Other Required Approvals and Relief* (Ky. PSC Feb. 13, 2015).

12. Commercial Incentive Program; and

13. School Energy Manager Program.

PROPOSED CHANGES TO EXISTING DSM PROGRAMS

For its existing residential DSM programs, Kentucky Power is seeking authorization to terminate its Modified Energy Fitness Program, High Efficiency Heat Pump Program, and Mobile Home High Efficiency Heat Pump Program, and to incorporate these three programs into its proposed Whole House Efficiency Program,[7] which is described below. Kentucky Power is proposing to discontinue the Mobile Home New Construction Program and to integrate the service offerings into the proposed New Manufactured Home Program,[8] which is also described below.

Kentucky Power also proposes to modify the following residential programs:

- Targeted Energy Efficiency: Kentucky Power proposes the addition of windows and doors to the list of eligible weatherization measures and to increase the cost per eligible home to $2,000.[9]

- Energy Education for Students: Kentucky Power is proposing to expand the focus of the program beyond the seventh grade to include all middle school grades. This expansion is intended to introduce energy-efficiency ("EE") concepts sooner and to provide a longer period over which to reinforce the concepts.[10]

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[7] *Id.* at 7.

[8] *Id.* at 8.

[9] Rogness Testimony at 24.

[10] *Id.* at 23.

- Community Outreach CFL: Kentucky Power is proposing to drop CFL from the title and modify the program so that other EE and conservation measures can be added to or replace items in the existing EE program.[11]

- Residential Efficient Products: Kentucky Power proposes to remove Energy Star refrigerators, freezers, and heat pump water heaters from the list of eligible products, as these items are no longer cost-effective, due to updated federal appliance standards and Kentucky Power's avoided costs. It proposes to add Energy Star air purifiers to the list of eligible products and to continue to offer incentives to qualifying dealers for compact fluorescent ("CFL") and light-emitting diode ("LED") light products to capture energy savings from replacing incandescent bulbs.[12]

- Appliance Recycling: Kentucky Power proposes to increase the program incentive range to \$50–\$70 from \$40–\$55.[13] This increased incentive range is intended to increase participation in the program.[14]

With regard to existing commercial DSM programs, Kentucky Power seeks authority to discontinue the Small Commercial HVAC program and to instead offer this program's services through the Prescriptive Rebate service within the new proposed Commercial Incentive Prescriptive Custom program.[15] This integration is intended to

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[11] *Id.*

[12] *Id.* at 24–25.

[13] *Id.* at 24.

[14] Kentucky Power's Response to Commission Staff's Initial Request for Information ("Staff's Initial Request"), Item 2.

[15] Rogness Testimony at 28.

allow the program administrator to take advantage of economies of scale in marketing and program administration.[16]

Kentucky Power also seeks approval to terminate the Commercial Incentive Program and to integrate the associated services into three new programs: the Commercial Incentive Prescriptive Custom Program, the Commercial Express Install Program, and the New Construction Program.[17] Kentucky Power contends that splitting the current Commercial Incentive Program into three distinct programs is sensible because each program operates differently and targets different segments of the commercial sector.[18]

PROPOSED NEW DSM PROGRAMS

Kentucky Power is proposing to implement six new programs: the Whole House Energy Efficiency, New Manufactured Home, Express Install, New Construction, Retro-Commissioning, and Commercial Incentive Prescriptive Custom Programs. Kentucky Power asserts that each new program takes an existing program, or components of existing programs, and incorporates them into a new program, thus increasing their effectiveness.[19]

Whole House Energy Efficiency Program: This program incorporates the existing Modified Energy Fitness, High Efficiency Heat Pump, Mobile Home High Efficiency Heat Pump, and New Mobile Home Construction programs. It expands the service offerings

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[16] *Id.* at 29.

[17] *Id.* at 28.

[18] *Id.* at 29.

[19] Application at 10–18.

through direct incentives provided to homeowners who install qualified EE measures. Additional home-weatherization measures have also been included, as well as a free Home Energy Audit and direct installation of identified energy conservation measures. This program is open to single-family and multi-family residences that have an electric central air-cooling system. It is projected to be cost-effective, with a 2016 Total Resource Cost ("TRC") score of 1.35.[20]

New Manufacture Home Program: This program replaces the Mobile Home New Construction Program. The program integrates and expands upon the previous services by adding a second-tier incentive level. Level 1 will provide a $450 incentive for customers purchasing a new mobile home with Zone 3 insulation and an efficient heat pump. Level 2 provides a $1,200 incentive for customers purchasing an Energy Star qualifying mobile home. The program is projected to be cost-effective, with a 2016 TRC score of 1.54.[21]

Express Install Program: Currently the Express Install measures are available through the Commercial Incentive Program. Kentucky Power proposes to separate these out and provide qualifying small commercial customers with a free energy assessment and incentives for the installation of qualifying high-efficiency lighting and refrigeration equipment. The program is projected to be cost-effective, with a 2016 TRC score of 1.01.[22]

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[20] Rogness Testimony at 27–28.

[21] *Id.* at 26.

[22] *Id.* at 31.

New Construction Program: This program incorporates elements currently available through the Commercial Incentive Program. The program provides incentives to encourage the incorporation of greater EE into commercial building design and building construction practices in connection with new construction and major renovation projects.[23] The program is projected to be cost-effective, with a 2016 TRC score of 1.24.[24]

Retro-Commissioning Program: This program provides a study to optimize customers' building-automation systems such as lighting and heating, ventilation, and air conditioning ("HVAC") systems. The study is based upon the building size and peak demand:

	Building Size	Peak Demand
RCx Lite	50,000 – 150,000 sq. ft.	150 – 499 kW
RCx Standard	>150,000 sq. ft.	>500 kw

RCx Lite: Qualifying customers agree to spend at least $5,000 on recommendations that yield a payback within 18 month or less. Customers receive rebates of $0.12 per kilowatt hour ("kWh") saved in the first year, up to $100,000.

RCx Standard: Qualifying customers agree to spend at least $15,000 on recommendations that yield a payback within 18 months or less. Customers receive rebates of $0.08 per kWh saved in the first year, up to $100,000.[25]

This program is projected to be cost-effective, with a 2016 TRC score of 1.13.[26]

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[23] Application at 14-15

[24] Rogness Testimony at 32.

[25] Application, Exhibit 6 at 94–95 of 105.

[26] Rogness Testimony at 33.

Commercial Incentive Prescriptive Custom Program: This program offers energy savings by assisting commercial customers' efforts to save energy through a broad range of EE options that address all major end uses and processes. Such processes include high-efficiency electric lighting, HVAC, pumps, and motors. Prescriptive and Custom incentives are available. For the Prescriptive option, customers select EE equipment from a prequalified list. Prescriptive rebates of up to $20,000 are issued upon project completion and submission of the rebate application. The Custom option applies to those customers whose equipment is not on the prequalified list. For this option, an application must be pre-approved prior to equipment purchase and installation and must have a TRC of 1.0 or greater. Rebates are $0.08 per kWh saved in the first year, up to 50 percent of the total project cost.[27] This program is projected to be cost-effective, with a 2016 TRC score of 1.55.[28]

Kentucky Power provided evaluation reports of all the programs contained in its DSM portfolio. Kentucky Power stated that the changes to its current DSM programs are a result of those evaluations, which were performed by Applied Energy Group, Inc. ("AEG").[29]

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[27] Application, Exhibit 6 at 72–73 of 105.

[28] Rogness Testimony at 31

[29] Application, Exhibit 6.

MARKET POTENTIAL STUDY

Kentucky Power retained AEG to conduct a Market Potential Study and a DSM Program Plan. The Market Potential Study was filed with the Commission on August 19, 2015, in accordance with the Commission's Order in Case No. 2014-00271.[30] The purpose of the Market Potential Study, which was required in Case No. 2013-00487,[31] was to assess EE and demand-response ("DR") potential in the residential, commercial, and industrial sectors. This study revealed that the largest potential for EE savings exists within the residential sector, specifically through lighting, water heating, and cooling measures. For the industrial class, the study found there was untapped savings potential specifically in regard to variable-speed drives to motor end uses. For DR potential, the study revealed potential savings through Time of Use Rates for medium and large commercial and industrial customers; however, such savings would not be realized until 2020.[32]

Kentucky Power is not recommending the adoption of any DR programs due to the lack of cost-effectiveness until 2020, but states that it will monitor potential DR measures to incorporate in its future DSM filings.[33]

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[30] Case No. 2014-00271, *Application of Kentucky Power Company for (1) Re-Authorization of Certain of Its Existing Programs; (2) Authority to Discontinue the Commercial and Residential HVAC Diagnostic and Tune-Up Programs; (3) Authority to Amend Its Demand Side Management Program to Implement Residential Home Performance and Residential Appliance Recycling Programs; (4) Authority to Recover Costs and Net Lost Revenues and to Receive Incentives Associated with the Implementation of the Programs; and (5) All Other Required Approvals and Relief* (Ky. PSC Feb. 13, 2015).

[31] Case No. 2013-00487, *Application of Kentucky Power Company to Amend Its Demand-Side Management Program and for Authority to Implement a Tariff to Recover Costs and Net Lost Revenues, and to Receive Incentives Associated with the Implementation of the Programs* (Ky. PSC June 30, 2014).

[32] Rogness Testimony at 13.

[33] *Id.* at 13–14.

Kentucky Power further states that it is not proposing any industrial DSM programs because participation of industrial customers in DSM programs is voluntary, and all industrial customers have exercised their option to opt out of its DSM program.[34]

In response to a Sierra Club request for information, Kentucky Power elaborated that its customer-service engineers regularly meet with its industrial customers, and that the customers sometimes inquire about the availability of DSM/EE programs sponsored by Kentucky Power. It states that industrial customers lose interest upon learning that any utility-sponsored DSM/EE program would require the payment of a DSM surcharge by the industrial customers.[35]

The application states that the proposed DSM Program plan was built upon Kentucky Power's existing programs, the DSM results from the Market Potential Study, utility industry DSM programs and best practices, cost-effectiveness, and stakeholder input.[36] The study included delivery framework, budget, projected impacts, and cost-effectiveness for DSM offerings from 2016 through 2025. Kentucky Power is proposing to adopt most of AEG's recommendations.

SIERRA CLUB'S COMMENTS

The Sierra Club filed comments addressing Kentucky Power's Application.[37] The Sierra Club states that it supports Kentucky Power's proposed increased EE investments and the expansions and modifications of its DSM/EE program portfolio.

[34] Kentucky Power's Response to Staff's Initial Request, Item 1.b.

[35] Kentucky Power's Response to Beverly May and Sierra Club's Second Request for Information, Item 4.

[36] Application, Exhibit 6 at 8 of 105.

[37] Beverly May and Sierra Club's Comments Regarding Kentucky Power Company's DSM/EE Application ("Sierra Club's Comments") (filed Dec. 23, 2015).

The Sierra Club supports Kentucky Power's proposal to increase its 2016 DSM program budget to comply with the terms of the Stipulation and Settlement Agreement ("Settlement Agreement") with the Kentucky Industrial Utility Customers, Inc. and the Sierra Club in Case No. 2012-00578.[38] However, the Sierra Club expresses concern over any expenditure shortfalls from what was agreed in the Settlement Agreement. Sierra Club requests in its comments that the Commission continue to closely monitor Kentucky Power's DSM expenditures to ensure that Kentucky Power meets its DSM investment obligations.[39]

The Sierra Club supports Kentucky Power's goal of expanding its cost-effective EE programs to achieve greater levels of savings, and it urges Kentucky Power to continue to look for further opportunities to expand its portfolio. However, the Sierra Club asserts that the modifications and new programs proposed by Kentucky Power will result in low overall savings and low projected savings growth over the next three years. As a result, the Sierra Club suggests that Kentucky Power continue to evaluate its market potential and look for further opportunities to deliver savings to its customers.[40]

The Sierra Club also expressed concern over the lack of any DR programs until 2020, stating that DR programs provide significant customer and system benefits and

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[38] Case No. 2012-00578, *Application of Kentucky Power Company for (1) a Certificate of Public Convenience and Necessity Authorizing the Transfer to the Company of an Undivided Fifty Percent Interest in the Mitchell Generating Station and Associated Assets; (2) Approval of the Assumption by Kentucky Power Company of Certain Liabilities in Connection with the Transfer of the Mitchell Generating Station; (3) Declaratory Rulings; (4) Deferral of Costs Incurred in Connection with the Company's Efforts to Meet Federal Clean Air Act and Related Requirements; and (5) All Other Required Approvals and Relief* (Ky. PSC Oct. 7, 2013).

[39] The Stipulation and Settlement Agreement from Case No. 2012-00578 provides, among other things, that aggregate annual spending by Kentucky Power on cost-effective DSM and EE measures through Commission-approved DSM programs is to be $6 million in 2016, 2017, and 2018, with a minimum annual spending level of $6 million thereafter unless otherwise authorized by the Commission.

[40] Sierra Club's Comments at 5.

that waiting until 2020 to implement a DR program can leave Kentucky Power's system less efficient, with customers paying for expensive peak power that could potentially be avoided. The Sierra Club suggests that Kentucky Power continue to investigate DR programs and other grid-modernization initiatives.[41]

The Sierra Club also commented that Kentucky Power should explore ways to offer DSM/EE programs to its industrial customers.[42] It acknowledged that Kentucky Power initiated the Market Potential Study as required in Case No. 2013-00487, and that the study included all customer sectors, including industrial customers.[43] As stated previously, the study found that there is some untapped savings potential, specifically in regards to variable speed drives.[44]

As Kentucky Power stated previously, participation in DSM programs is voluntary for industrial customers, and all have chosen to opt out.[45] Kentucky Power further explains that two of the proposed commercial programs, the Commercial Prescriptive Custom and New Construction programs, include incentive measures for variable-speed drive applications that are easily adaptable for industrial customers.

The Sierra Club notes this response and points out that Kentucky Power has not proposed to adapt these programs for industrial applications, and that opting out does

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[41] *Id.* at 6.

[42] Kentucky Power at one time had Industrial Sector DSM programs. The last program expenditures are shown in the Application, Exhibit 2 at 62–63.

[43] Case No. 2013-00487, *Application of Kentucky Power Company to Amend Its Demand-Side Management Program and for Authority to Implement a Tariff to Recover Costs and Net Lost Revenues, and to Receive Incentives Associated with the Implementation of the Programs* (Ky. PSC June 30, 2014).

[44] AEG Market Potential Assessment, Executive Summary at 3, in Case No. 2014-00271, *Kentucky Power Company* (filed Aug. 10, 2015), Post Case Referenced Correspondence files.

[45] Kentucky Power's Response to Staff's Initial Request, Item 1.b.

not imply that the industrial class should not be provided with any opportunity to achieve energy savings through DSM/EE opportunities.[46]

The Sierra Club urges Kentucky Power to develop an industrial program or modify the existing commercial programs, with a goal of including industrial offerings in Kentucky Power's next DSM/EE application, if not sooner.[47]

PROPOSED DSM FACTORS

Kentucky Power's current residential DSM factor is $0.000383 per kWh, which it proposes to increase to $0.003159 per kWh. Its current commercial DSM factor is $0.001473 per kWh, which it proposes to increase to $0.001835 per kWh. The basis for the proposed DSM factors is included in revised Exhibit 3 - Schedule C.[48]

INDUSTRIAL DSM/EE PROGRAMS AND INDUSTRIAL OPT-OUT

The Commission has previously held in Case No. 2014-00003[49] that KRS 278.285(3) does not provide for a categorical industrial opt-out of utility-offered DSM or EE programs targeted at industrial customers. Further, the Commission stated that the statute employs a two-part analysis before an industrial customer may opt out: first, the industrial customer must be an energy-intensive customer, and second, the energy-intensive customer must have adopted cost-effective EE measures. Kentucky Power

[46] Sierra Club's Comments at 7–8.

[47] *Id.* at 9.

[48] Kentucky Power's Response to Staff's Initial Request, Item 25.

[49] Case No. 2014-00003, *Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Existing, and Addition of New, Demand-Side Management and Energy-Efficiency Programs* (Ky. PSC, Nov. 14, 2014), Final Order at 27–30.

provided a breakdown of its industrial customers by Standard Industrial Classification ("SIC") code in Case No. 2014-00396.[50]

It is not apparent from the list provided[51] that all of Kentucky Power's industrial customers are energy-intensive users. If the 1,264 customers that are characterized as "industrial" by the SIC codes are not all, in fact, energy-intensive customers, then it may not be reasonable to assume that a categorical opt-out of DSM/EE measures is justified. To the extent that cost-effective programs could benefit small industrial customers to whom the opt-out provision of KRS 278.285(3) does not in fact apply, and who have not adopted cost-effective EE measures, Kentucky Power should explore identifying those customers and developing such programs.

FINDINGS

Based on the evidence of record and being otherwise sufficiently advised, the Commission finds that:

1. Kentucky Power has kept the Commission informed of the progress and status of its DSM programs by timely filing summary status reports of these programs.

2. Kentucky Power's modifications and additions to the current DSM/EE portfolio through December 31, 2018, should be approved.

3. Kentucky Power should continue its consideration and review of potential cost-effective DSM/EE programs that could be included in future DSM portfolios. While

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[50] Case No. 2014-00396, *Application of Kentucky Power Company for: (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving Its 2014 Environmental Compliance Plan; (3) An Order Approving Its Tariffs and Riders; and (4) An Order Granting All Other Required Approvals and Relief* (Ky. PSC June 22, 2015).

[51] *Id.*, Kentucky Power's Response to Commission Staff's Third Request for Information (filed Mar. 9, 2015), Item 43.

KRS 278.285(3) permits energy-intensive industrial customers to decline to participate in industrial DSM programs, the AEG's Market Potential Study finding that there is untapped savings potential with regard to variable-speed drives to motor end uses and Time of Use rates provides sufficient support for requiring Kentucky Power to continue examining potential industrial-sector cost-effective DSM/EE programs. Accordingly, in its next application for approval of its DSM programs and surcharge factors, Kentucky Power should identify: (1) the number of customers that it has heretofore classified as industrial for purposes of DSM opt out pursuant to KRS 278.285(3); (2) of those, the number of customers that can be categorized as energy-intensive users and support for that determination; and (3) the number of customers that, in spite of having SIC code designations, are not energy-intensive customers. To the extent that customers are identified as falling into the last category, Kentucky Power should provide an evaluation of cost/effective DSM/EE programs that could be developed or modified to benefit them.

4. Kentucky Power should continue to file monthly updates as to the level of direct program expenditures through 2018, with an explanation of how it plans to meet the $6 million spending levels required by the Settlement Agreement filed and approved, as modified, in Case No. 2012-00578.

5. Within 20 days of contract execution, Kentucky Power should provide a copy of any fully executed contract or modifications/amendments of any existing contract with any DSM program contractor.

6. Kentucky Power's proposed DSM surcharge factors of $0.003159 per kWh for residential customers and $0.001835 per kWh for commercial customers, as revised through discovery, should be approved.

IT IS THEREFORE ORDERED that:

1. Kentucky Power's modifications and additions to the current DSM/EE portfolio through December 31, 2018, are approved as filed.

2. Kentucky Power shall continue its consideration and review of potential cost-effective DSM/EE programs, including industrial programs that could be included in future DSM portfolios, and shall identify the number of customers that could qualify for industrial programs and that are not eligible to opt out based on the energy intensity of their usage, as required in finding paragraph 3.

3. Kentucky Power shall comply with the requirements of finding paragraphs 3, 4, and 5.

4. Kentucky Power's proposed DSM surcharge factors as revised through discovery are approved effective for service rendered on and after the date of this Order. Within ten days from the date of this Order, Kentucky Power shall file with this Commission, using the Commission's electronic Tariff Filing System, revised tariff sheets setting out rates approved herein and reflecting that they were approved pursuant to this Order.

5. Any documents filed pursuant to finding paragraphs 4 and 5 of this Order shall reference the number of this case and shall be retained in the utility's general correspondence file.

6. The Executive Director is authorized to grant reasonable extensions of time for the filing of any documents required by this Order upon Kentucky Power's showing of good cause for such extension.

By the Commission

ENTERED

MAR 11 2016

KENTUCKY PUBLIC
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