

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

**In The Matter Of Electronic
Investigation Of The Reasonableness
Of The Demand Side Management
Programs And Rates Of Kentucky
Power Company**

Case No 2017-00097

**MOTION OF KENTUCKIANS FOR THE COMMONWEALTH, INC.
ELIZABETH SANDERS, AND ALICE WHITAKER
TO INTERVENE IN THIS MATTER**

Pursuant to KRS § 278.310 and 807 KAR 5:001 § 4(11)(a), Kentuckians For The Commonwealth, Inc. (“KFTC”), Elizabeth Sanders, and Alice Whitaker (collectively “KFTC Movants”) respectfully move the Commission for leave to intervene in the above-captioned case. KFTC Movants seek full intervention to ensure that their interests in Kentucky Power Company’s (“KPCO”) Demand-Side Management and energy efficiency programs (collectively “DSM Programs”) are fully represented, and to bring to this proceeding their specific knowledge and expertise concerning KPCO’s DSM programs and DSM programs generally.

In this Investigation the Commission will examine the KPCO’s DSM Programs. Any reduction of cost-effective DSM Programs adversely affects all KPCO customers, including low-income residential customers. In addition, commercial customers have received lower electric bills and increased economic value to their businesses by participating in KPCO’s DSM Programs.

KFTC Movants have specific experience with and expertise regarding the KPCO’s DSM programs. KFTC Movants’ intervention will assist the Commission in fully considering the matter. Furthermore, no other party adequately represents KFTC Movants’ special interests

in this proceeding. Therefore, KFTC Movants seek full intervention in this proceeding.

KFTC is a 35-year-old statewide community organization with 11,000 dues-paying members and 13 local chapters. Three KFTC chapters are located in KPCO's service area: Big Sandy Chapter (covering Floyd, Johnson, Pike, Martin and Magoffin Counties); Perry County Chapter; and Letcher County Chapter (KFTC's oldest). KFTC is a 501(c)(4) not-for-profit, tax-exempt organization that, in part, promotes and provides services to ensure economic opportunities for Kentuckians in KPCO's service area. KFTC also explores and develops low-cost energy solutions including DSM programs. KFTC has decades-long experience collaborating with multiple utilities in part to expand cost-effective energy efficiency opportunities.

KFTC seeks to intervene both to represent the interests of its members in the KPCO service area and on its own behalf. KFTC is a KPCO customer for its two regional offices in Prestonsburg and Whitesburg. The accounts for those offices are in the name of KFTC's sister organization, Kentucky Coalition. KFTC reimburses Kentucky Coalition each month for a share of the bill, based on the amount of staff time devoted to KFTC activities each month.

Movant Elizabeth Sanders is the Chairperson of KFTC and a KPCO customer. She lives at 337 East Main Street, Apartment 9, in Whitesburg, Kentucky. Ms. Sanders is interested in KPCO's DSM program as both a consumer and as a representative of KFTC. As KFTC's Chairperson, Ms. Sanders provides leadership on many local initiatives, including community development initiatives in the KPCO service area. As part of her work with the community, Ms. Sanders is particularly interested in ensuring that DSM programs benefit and are accessible to low-income residents in the KPCO service area. Ms. Sanders is interested in seeing that KPCO's energy-efficiency and DSM programs are robust and well-designed so that they help residents, including herself, and local businesses reduce their energy usage and power bills.

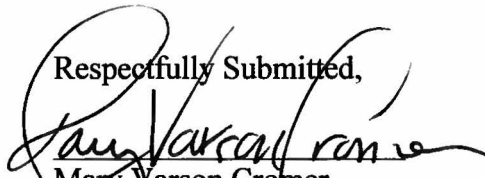
Movant Alice Whitaker is also a member of KFTC and a KPCO customer. Ms. Whitaker's address is 5837 Lotts Creek Road, Hazard, KY 41701-9024, where she pays the bill sent to "Lotts Creek Community School – Alice Whitaker." Ms. Whitaker directs the Lotts Creek Community School. Lotts Creek School is a community institution providing high quality education and a broad range of services, including a housing repair program, food pantry, medical assistance, and wellness programs. Ms. Whitaker wants to ensure that KPCO's DSM program curbs high energy usage, not just for herself as a customer, but also for the families of the nearly 250 students at her school and other clients served by the Lotts Creek School.

Ms. Sanders and Ms. Whitaker have authorized KFTC to move to intervene on their behalves.

KFTC Movants are likely to present testimony from small commercial customers and low-income residential customers who have benefited from KPCO's DSM Programs, as well as from energy-efficiency experts working in Eastern Kentucky. Accordingly, KFTC Movants have a special interest in this proceeding and will provide a perspective that will not be presented by other parties in this proceeding. The Movants will present issues and develop facts that will be helpful to the Commission in fully hearing this matter. Participation by KFTC Movants will not unduly delay these proceedings, or unduly complicate or disrupt them.

WHEREFORE, KFTC Movants request that they be granted leave for full intervention and that they be certified as a full parties in this proceeding, including the right to present testimony and exhibits, present witnesses, cross-examine witnesses, and be served with filed testimony, exhibits, pleadings, correspondence, and all other documents submitted by the parties or orders of the Commission.

Respectfully Submitted,

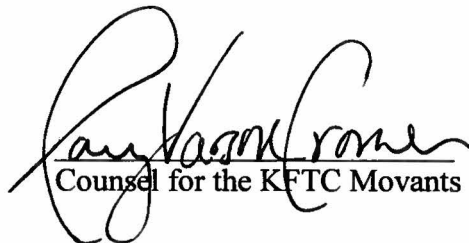


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CERTIFICATE OF SERVICE

Pursuant to 807 KAR 5:001 Sec. 6, I, Mary Varson Cromer, hereby certify that on March 23, 2017, a true and accurate copy of the foregoing MOTION OF KFTC, ELIZABETH SANDERS, AND ALICE WHITAKER TO INTERVENE IN THIS MATTER was served via electronic mail to the following:

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