

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

Electronic Application of Kentucky Power)	
Company For (1) A General Adjustment of)	
Its Rates for Electric Service; (2) An Order)	
Approving its 2017 Environmental Compliance)	
Plan; (3) An Order Approving Its Tariffs And)	CASE NO:
Riders; (4) An Order Approving Accounting)	2017-00179
Practices to Establish a Regulatory Asset or)	
Liability Related to the Big Sandy 1 Operation)	
Rider; and (5) An Order Granting All Other)	
Required Approvals and Relief)	

COMMUNITY ACTION KENTUCKY, INC.'S
MOTION TO INTERVENE

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Comes Community Action Kentucky, Inc. (hereinafter “CAK”), by counsel, and pursuant to 807 KAR 5:001 Section 4(11) moves that it be granted leave to intervene in this matter and that it be granted full intervention.

In this matter the Commission will examine the application of Kentucky Power Company for an adjustment of its electric rates and other approvals. Any increase in electric bills that may result from this application will adversely impact the low-income population served by CAK in the service area of Kentucky Power Company. Because many persons in Kentucky Power Company’s service area live at or below the poverty level, the proposed increase will affect them disproportionately, since they are currently struggling to pay for their essential needs.

CAK, whose address is 101 Burch Court, Frankfort, Kentucky, is a 501(c)(3) non-profit corporation that represents a network of 23 community action agencies in Kentucky. These community action agencies provide direct social services to Kentuckians with low incomes in all of Kentucky’s 120 counties.

CAK, in partnership with the Department of Community Based Services, administers the federally funded Low Income Home Energy Assistance Program (LIHEAP) in Kentucky through its network of community action agencies. CAK'S network of community action agencies provide energy assistance and related services to many low income residents in Kentucky Power Company's service territory. CAK has partnered with Kentucky Power Company in programs to assist its low income customers, including the Home Energy Assistance (HEA) Program.

In addition, CAK has in years past intervened in rate cases before the Commission, most recently in 2009. In those cases, CAK advocated for lower rates and programs that provide assistance for low-income customers and which encourage energy efficiency and conservation.

Because CAK is the primary advocate for low income customers in Kentucky Power Company's service area, it has a special interest in this proceeding and will provide a perspective which will not be presented by the other parties to this proceeding. CAK'S interests are not adequately represented by the other parties to this proceeding. While the Office of the Attorney General represents the interests of residential rate payers generally, it cannot adequately represent the interests of the most vulnerable customers of Kentucky Power's service territory--the low income customers. CAK will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by CAK will not unduly delay these proceedings, or unduly complicate or disrupt them. CAK expects to offer the testimony of its Executive Director Roger McCann.

CAK respectfully requests the Commission to grant its motion which is filed beyond the intervention motion deadline stated in the Commission's scheduling order of July 17, 2017. That order stated that Kentucky Power Company's application would be deemed filed on July 20, 2017. It states the reason being that the first publication of Kentucky Power Company's supplemental notice will be completed by July 20, 2017, and that the filing deficiencies would

then be cured. However, the intervention deadline in the scheduling order was stated as July 14, 2017.

Since becoming aware of this application, the staff at CAK has diligently communicated with its member community action agencies in the service territory, as well as the Office of the Attorney General for Rate Intervention, obtained counsel, and has moved to intervene as expeditiously as possible. If granted intervention, CAK commits that it will comply with the deadlines in the scheduling order.

WHEREFORE, CAK requests that the Commission look favorably upon its request for enlargement of time due to the application irregularities, and the July 20, 2017 filing date, and grant CAK leave for full intervention. CAK requests that it be certified as a full party 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

I hereby certify that CAK'S July 31, 2017 electronic filing is a true and accurate copy of CAK'S Motion to Intervene and Read 1st document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on July 31, 2017; that an original and six copies of the filing will be delivered to the Commission on July 31, 2017; that there are currently no parties excused from participation by electronic service; and that, on July 31, 2017 electronic mail notification of the electronic filing is provided to the following:

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