

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF KENTUCKY)
POWER COMPANY AND COMMUNITY ACTION KENTUCKY)
INC. TO: (1) EXPAND AND MODIFY KENTUCKY POWER)
COMPANY'S HOME ENERGY ASSISTANCE PROGRAM;) CASE NO.
(2) APPROVE THE AMENDED OPERATING AGREEMENT;) 2018-00311
(3) APPROVE KENTUCKY POWER'S VOLUNTARY ENERGY)
ASSISTANCE FUND; (4) APPROVE REVISED TARIFF)
SHEETS; AND (5) GRANT ALL OTHER RELIEF TO)
WHICH THEY MAY BE ENTITLED)

COMMISSION STAFF'S SUPPLEMENTAL REQUEST FOR INFORMATION TO
KENTUCKY POWER COMPANY AND COMMUNITY ACTION KENTUCKY, INC.

Kentucky Power Company (Kentucky Power) and Community Action Kentucky, Inc. (CAK), pursuant to 807 KAR 5:001, are to file with the Commission the original and an electronic version of their responses to the following information, with a copy to all parties of record. The information requested herein is due on or before October 15, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked. Each response 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 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 and CAK shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky Power and CAK fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied 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 filing a paper containing personal information, Kentucky Power and CAK 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, paragraphs 12 and 13. Explain how each community action agency verifies the final eligibility and waitlist ranking.
2. Refer to the Application, paragraph 17. Explain how a participant fails to meet the eligibility requirement once eligible and how it is verified.
3. Refer to the Application, paragraph 32, regarding the seven percent administrative fee charged by CAK. Explain how this administrative fee complies with the provisions of KRS 278.287(15), which set forth an administrative fee of three percent for providers of voluntary energy cost assistance funds.
4. Refer to the Application, Exhibit 2, page 4 of 21, Section III, Paragraph D.

- a. Provide the cost percentage for the prior agreement between Kentucky Power and CAK regarding the home energy assistance programs.
 - b. Provide the number of times in the past five years the costs billed by CAK to Kentucky Power exceeded 10 percent.
 - c. Provide an example bill.
 - d. Explain how the costs involved in managing the HEART program will be minimized in order to maximize benefits to participants
 - e. Explain how the costs involved in managing the THAW program will be minimized in order to maximize benefits to participants.
5. Refer to the Application, Exhibit 2, page 9 of 21, Section VI.
 - a. Refer to Paragraph B. Explain how CAK confirms the participant meets the eligibility requirements.
 - b. Refer to Paragraph C. Explain how CAK confirms the participant meets the eligibility requirements.
 6. Refer to the Application, Exhibit 2, page 12 of 21, Section VI, Paragraph F, Subsection iv. Explain whether the \$25.00 CAK pays each community action agency for each slot is in addition to the 10 percent cost cap or included in the cost cap.
 7. Refer to the Application, Exhibit 2, page 13–15 of 21, Section VII.
 - a. Refer to Paragraph B. Explain how CAK confirms the participant meets the eligibility requirements.
 - b. Refer to Paragraph E, subsection iv. Explain whether the \$16.00 CAK pays each community action agency for each slot is in addition to the 10 percent cost cap or is included in the cost cap.

8. Refer to the Horeled Testimony, pages 4, line 23 and continuing onto page 5, lines 1–2.

a. For the selection process, explain whether the local community action agency accepts applications and fills the slots on a first come first serve basis if the criteria is met, or does the local community action agency accept all applications during a window of time and access all at once to allocate the slots based on a ranking of need?

b. If the above answer is based on ranking, describe the ranking criteria.

9. Refer to the Horeled Testimony, page 7, lines 4–5.

a. Provide how the failure of eligibility for the program is confirmed and verified.

b. Provide the number of slots that have become available after the initial selections of home energy assistance recipients by year for the past five years.

10. Refer to the Horeled Testimony, page 12, lines 8–10. Explain in detail how the Average Monthly Payment Plan will help participants transition off the HEART program.

11. Refer to the Horeled Testimony, page 13, lines 18–19. Show calculations that explain how the maximum benefit per winter heating season of \$175.00 per eligible customer was determined.

12. Refer to Horeled Testimony, page 14, lines 11–13. Provide the proof of hardship criteria that CAK and the local community action agencies have developed.

13. Provide all marketing material related to the HEART and THAW programs.

14. Explain whether the special customer contributions from the HEART program will be maintained in trust and kept separate from other customer assistance programs administered by Kentucky Power as required by KRS 278.287(1)(a)(3). Also, explain whether the HEART and THAW program funds will be kept in interest-bearing accounts.

for 

Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 08 2018

cc: Parties of Record

*Christen M Blend
Kentucky Power Company
855 Central Avenue, Suite 200
Ashland, KY 41101

*Hector Garcia
Kentucky Power Company
855 Central Avenue, Suite 200
Ashland, KY 41101

*Kentucky Power Company
855 Central Avenue, Suite 200
Ashland, KY 41101

*Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Honorable Mark R Overstreet
Attorney at Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634