

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

The 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) 2014-00271
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)

APPLICATION

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Public Service Commission of Kentucky (“Commission”) pursuant to KRS 278.285(1) for an Order: (1) reauthorizing certain of Kentucky Power’s existing Demand-Side Management (“DSM”) programs for the periods further described in this Application; (2) authorizing Kentucky Power to discontinue its Residential and Commercial HVAC Diagnostic and Tune-Up Programs; (3) granting the Company authority to implement its proposed Residential Home Performance Program and its Residential Appliance Recycling Program; (4) approving the Company’s recovery through its Demand-Side Management Clause of its full costs, including lost revenues and incentives, associated with both the Company’s existing programs and the two proposed programs; and (5) granting all other required relief or approvals. In support thereof Kentucky Power states:

APPLICANT

1. Kentucky Power was organized in 1919 under the laws of the Commonwealth of Kentucky.¹ The Company's mailing address is 101A Enterprise Drive, P.O. Box 5190, Frankfort, Kentucky 40602-5190. Its electronic mail address is kentucky_regulatory_services@aep.com . Kentucky Power is engaged in the generation, purchase, transmission, distribution and sale of electric power. The Company serves approximately 173,000 retail customers in the following 20 counties of eastern Kentucky: Boyd, Breathitt, Carter, Clay, Elliott, Floyd, Greenup, Johnson, Knott, Lawrence, Leslie, Letcher, Lewis, Magoffin, Martin, Morgan, Owsley, Perry, Pike and Rowan. In addition, the Company also supplies electric power at wholesale to other utilities and municipalities in Kentucky for resale. Kentucky Power is a utility as that term is defined at KRS 278.010. [807 KAR 5:001, Section 14].

2. Kentucky Power is a direct, wholly-owned subsidiary of American Electric Power Company, Inc.

¹ A certified copy of the Company's Articles of Incorporation and all amendments thereto was attached to the Joint Application in *In the Matter Of: The Joint Application Of Kentucky Power Company, American Electric Power Company, Inc. And Central And South West Corporation Regarding A Proposed Merger*, P.S.C. Case No. 99-149. The Company's August 12, 2014 Certificate of Existence is attached as **EXHIBIT 1**.

REQUEST FOR REAUTHORIZATION OF THE COMPANY'S EXISTING DSM/EE PROGRAMS

A. Kentucky Power's Existing DSM/EE Programs

3. Kentucky Power has offered DSM/EE programs since 1994. It currently offers nine residential and four commercial DSM/EE programs² for its residential and commercial customers:

- Targeted Energy Efficiency;
- Modified Energy Fitness;
- Energy Education For Students;
- Community Outreach CFL;
- Residential Efficient Products;
- High Efficiency Heat Pump;
- Mobile Home High Efficiency Heat Pump;
- Mobile Home New Construction;
- Residential HVAC Diagnostic and Tune-up;
- Commercial HVAC Diagnostic and Tune-up;

² The programs are offered pursuant to twelve tariffs filed with the Commission. Two of the programs, the Residential HVAC Diagnostic and Tune-up Program and the Commercial HVAC Diagnostic and Tune-up Program are offered pursuant to a single tariff. In addition, one of the commercial programs, the School Energy Manager Program, only recently was approved by the Commission by Order dated July 25, 2014 in Case No. 2014-00178, *In The Matter Of: The Application Of Kentucky Power Company For (1) Approval of A School Energy Manager Program; And (2) For All Other Required Approvals And Relief* (Ky. P.S.C. July 25, 2014) (the "School Manager Program Order"), and presently is being implemented. Pursuant to the Appendix B of the Commission's October 7, 2013 Order in Case No. 2012-00578, *In the Matter of: The Application of Kentucky Power Company For: (1) A Certificate of Public Convenience And Necessity Authorizing The Transfer To the Company Of A Fifty Percent Undivided 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) For All Other Required Approvals And Relief* (Ky. P.S.C. October 7, 2013) ("Mitchell Transfer Order"), and the Commission's School Manager Program Order this program is limited to school districts within Kentucky Power's service territory and located in Lawrence and contiguous counties. The costs of this program are being funded solely by the Company and are not being recovered through the Company's DSM surcharge.

- Small Commercial HVAC;
- Commercial Incentive Program; and
- School Energy Manager Program.

4. Since their implementation, Kentucky Power's DSM/EE programs have produced cumulative energy savings of approximately 608,033 MWh (668,837 MWh when "avoided" transmission and distribution line losses are accounted for) and an approximate cumulative winter demand reduction of 32,757 kW (36,360 kW when "avoided" transmission and distribution line losses are accounted for.) Through June 30, 2014 the year to date reductions totaled approximately 6,630 MWh (7,293 MWh when "avoided" transmission and distribution line losses are accounted for) and 1,057 kW reduction in winter demand (1,173 kW when "avoided" transmission and distribution line losses are accounted for.)

5. Year-to-date through June 30, 2014 the Company has collected \$4,062,428 through the DSM factor and incurred \$2,029,197 in DSM program costs, lost revenues, and incentive payments. For the entirety of the Company offer of DSM/EE programs it has incurred, through June 30, 2014, \$27,528,107 in program costs, lost revenues, and incentive payments, and received \$27,299,102 in revenue through the DSM factor.

6. The Company's existing DSM/EE programs (other than the School Energy Manager Program) were most recently approved by Order of the Commission as follows:

January 23, 2012 Order of the Commission in Case No. 2011-00300

- (a) Targeted Energy Efficiency Program (Tariff Sheet 22-3);
- (b) Mobile Home New Construction Program (Tariff Sheet 22-10);

- (c) Mobile Home High Efficiency Heat Pump Program (Tariff Sheet 22-9);
- (d) High Efficiency Heat Pump Program (Tariff Sheet 22-8);
- (e) Community Outreach CFL (Tariff Sheet 22-6); and
- (f) Energy Education For Students (Tariff Sheet 22-5)

February 22, 2013 Order of the Commission in Case No. 2012-00367

- (a) Commercial Incentive Program (Tariff Sheet 22-13);
- (b) Residential HVAC Diagnostic and Tune-up Program (Tariff Sheet 22-11);
- (c) Commercial HVAC Diagnostic and Tune-up Program (Tariff Sheet 22-11);
- (d) Residential Efficient Products Program (Tariff Sheet 22-7); and
- (e) Small Commercial HVAC Program (Tariff Sheet 22-12).

June 28, 2013 Order of the Commission in Case No. 2013-00138

- (a) Modified Energy Efficiency Program (Tariff Sheet 22-4).

The current authorizations expire December 31, 2014.

B. Evaluation Of The Company's Existing DSM/EE Programs

7. In conformity with the Commission's February 22, 2013 Order in Case No. 2012-00367 granting the Company's request that beginning with its August 15, 2014 filing that all programs be evaluated at the same time and as part of the same proceeding, Kentucky Power

contracted with Applied Energy Group, Inc. to evaluate the Company's then-existing 12 DSM/EE programs.

8. Kentucky Power's then-existing suite of 12 DSM/EE programs were evaluated for the program years 2012 and 2013. The evaluation indicated that the existing programs are cost-effective, having a Total Resource Cost ("TRC") ratio of 1.73, and yielded significant savings throughout the Company's service territory. Prospectively, the existing programs are projected to continue to be cost-effective with a TRC ratio of 1.85. Further, the evaluation revealed that satisfaction rates were generally above 90%, with most participants responding they were "highly satisfied" with the programs. Finally, the evaluation indicated that the Company was employing a diverse marketing strategy. The July 2014 Applied Energy Group, Inc. "2012-2013 Demand-Side Management Portfolio Evaluation" is attached to this Application as **EXHIBIT 2**. In addition, a DSM/EE Status Report is attached to this application as **EXHIBIT 3**.

C. Review By The Company's Collaborative.

9. On July 31, 2014 Kentucky Power's Collaborative met at the Company's Ashland, Kentucky Service Center building to review and comment upon the Applied Energy Group, Inc.'s evaluation of the Company's existing DSM/EE programs, the Status Report and Program budgets, including "Exhibit C," and the Company's proposals with respect to its existing and proposed DSM/EE programs.

10. Representatives of the Office of Attorney General, Office of Rate Intervention, Big Sandy Community Action Council, Community Action Kentucky, LKLP Community Action Council, Northeast Kentucky Community Action Agency, Our Lady of Bellefonte Hospital, and Sierra Club, along with representatives of the Company attended the meeting.

11. During the course of the meeting a vote was taken to approve the Status Report and Program budgets, including “Exhibit C”, the Company’s proposals with respect to its existing and proposed DSM/EE programs, and the Evaluation Report. There were no objections; the representatives of the Office of the Office of Attorney General, Office of Rate Intervention abstained from the vote. A copy of the minutes of the July 31, 2014 Collaborative Meeting are attached as EXHIBIT 4.

D. Request To Re-Authorize And Extend As Modified Certain Of The Company’s Existing DSM/EE Programs.

12. Kentucky Power proposes to extend the following DSM/EE programs for the three-year period 2015-2017:

- Targeted Energy Efficiency;
- Modified Energy Fitness;
- Energy Education For Students;
- Community Outreach CFL;
- Residential Efficient Products;
- High Efficiency Heat Pump;
- Mobile Home High Efficiency Heat Pump;
- Mobile Home New Construction; and
- Commercial Incentive Program.

13. Kentucky Power also recommends that the Small Commercial HVAC Program be extended an additional year through December 31, 2015 for purposes of further review. The program is not currently cost-effective (TRC 0.74) but can become cost-effective (TRC 1.74) in

program year 2015 with only moderate (15 heat pumps and five air conditioners) participation. The requested one year extension will provide an opportunity to assess customer participation and as well as provide a further opportunity for development of the dealer network. Based upon the results of the review and further operation of the program, the Company may extend it through 2017.

14. In conjunction with the extension of the identified existing DSM/EE programs, the Company proposes to modify its Residential Efficient Products, Community Outreach CFL, Energy Education for Students, Modified Energy Fitness, Mobile Home High Efficiency Heat Pump, High Efficiency Heat Pump, and Targeted Energy Efficiency programs. The modifications are being proposed in response to the evaluation performed by Applied Energy Group, Inc. The proposed modifications are described in more detail in the DSM/EE Status Report filed as **EXHIBIT 3** to this Application, and in the testimony of Ranie K. Wohnhas also filed with this Application.

REQUEST TO TERMINATE THE RESIDENTIAL COMMERCIAL HVAC DIAGNOSTIC AND TUNE-UP PROGRAM

15. In conformity with the recommendations provided by Applied Energy Group, Inc. in its evaluation report, Kentucky Power seeks authorization to terminate its Residential HVAC Diagnostic and Tune-Up Program and its Commercial HVAC Diagnostic and Tune-up Program effective January 1, 2015.

16. The recommendation and the Company's request are premised upon three bases:

(a) The programs are not cost-effective. The TRC ratio for the residential program was 0.24, while the TRC ratio for the commercial program was 0.22;

(b) Free-ridership for the diagnostic programs is increasing resulting in a declining net-to-gross ratio; and

(c) The resources currently being employed in connection with the programs (for example, projected 2014 program expenditures of \$29,231) can be directed to more cost-effective and successful programs.

REQUEST FOR AUTHORIZATION OF THE COMPANY'S PROPOSED DSM PROGRAMS

17. On July 2, 2013 Kentucky Power, Kentucky Industrial Utility Customers, Inc., and Sierra Club and its residential intervenors entered into a Stipulation and Settlement Agreement in Case No. 2012-00578. Paragraph 12 of the Stipulation and Settlement Agreement provides in part:

Further, Kentucky Power agrees to increase its aggregate spending on cost-effective DSM and energy efficiency measures through Commission-approved DSM programs to \$4 million in 2014; \$5 million in 2015; and \$6 million in 2016, 2017, 2018.³

18. On October 7, 2013, the Commission entered its Order in Case No. 2012-00578 approving, with four modifications, the terms and conditions of the July 2, 2013 Stipulation and Settlement Agreement. None of the modifications affected or otherwise addressed the provision quoted in paragraph 1 above.

³ Order, *In the Matter of: The Application of Kentucky Power Company For: (1) A Certificate of Public Convenience And Necessity Authorizing The Transfer To the Company Of A Fifty Percent Undivided 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) For All Other Required Approvals And Relief* App. A at 9 (Ky. P.S.C. October 7, 2013) ("Mitchell Transfer Order").

19. On October 14, 2013, Kentucky Power filed its acceptance of the four modifications to the Stipulation and Settlement Agreement imposed by the Commission's October 7, 2013 Order.

20. By this application the Company is seeking all required authorizations to implement two new DSM programs in furtherance of the identified portion of Paragraph 12 of the Stipulation and Settlement Agreement.

A. The Proposed Residential Home Performance Program.

21. The Residential Home Performance program is limited to customers taking service under the Company's residential tariffs (Tariff R.S., Tariff R.S-L.M.-T.O.D., Tariff R.S.-T.O.D., and R.S.-T.O.D.-2). The program will target, but will not be limited to, all-electric residential customers with internet access. The program will provide participants with information concerning their electric usage, as well as actions they can take to reduce their electric usage. *The program is designed to encourage modification of customers' electric energy-consumption behavior and practices.*

22. The initial term of the program is three years. The Company anticipates there will be 65,000 participants at the end of the initial term. To measure energy savings resulting from program participation, customers will be randomly assigned by a vendor to "control" and "participant" groups. In addition, the program will be evaluated during the third year of its operation.

23. Evaluation, equipment, program implementation, and other vendor services will be secured through a competitive request for proposals. An estimated budget for the three-year initial term is attached as EXHIBIT 5.

24. The Company projects that by the end of the initial three-year term participants will have reduced their annual energy usage by 16,981 MWh. Kentucky Power also projects a reduction of the Company's peak residential demand of 3.29 MW at the end of the initial three-year term.

25. Kentucky Power anticipates implementing the program in accordance with the following timeline:

<u>Action</u>	<u>Start</u>	<u>End</u>
Program Filing, Review, and Approval ¹	8/15/2014	1/1/2015
Vendor RFP & Contract	4/1/2014	9/30/2014
IT Setup and Integration	10/15/2014	12/30/2014
Implementation ²	1/1/2015	12/31/2017
Evaluation ³	10/3/2016	6/30/2017

Note:

1. Program filing follows DSM Collaborative Review on July 31, 2014.
2. Program implementation will begin following PSC program approval.
3. Evaluation Report to be filed August 15, 2017.

26. The Residential Home Performance Program cost-benefit analysis is attached as EXHIBIT 5.

B. The Proposed Residential Appliance Recycling Program.

27. The Residential Appliance Recycling Program is intended to reduce demand and energy savings through removal of older, less-efficient refrigeration units in residences with two or more refrigerator or freezer units.

28. The United States Environmental Protection Agency reported in 2008 that 26% of residences in the United States were employing two or more refrigerators or freezers. Twenty eight percent of the second units were manufactured prior to 1993 and consume more than twice the energy of a new Energy Star-qualified refrigeration unit. In addition, approximately ten percent of households purchasing a new refrigerator or freezer will retain the existing unit, thereby increasing the number of second refrigerators and freezers nationwide by 800,000 to one million units per year.

29. Older residential refrigeration units typically contain ozone-depleting substances, mercury, and other toxic chemicals, and oils. It thus is important that the units be disposed of in an environmentally responsible fashion.

30. Kentucky Power's proposed Residential Appliance Recycling Program is intended to reduce electric energy usage by removing operable second refrigerators and freezers from use and then recycling the units in an environmentally safe manner. The program will provide residential customers with financial incentives of \$40-\$55 in return for permitting the disposal of the units in an environmentally safe fashion by the program contractor. Kentucky Power will contract with a vendor for the environmentally sound disposal of the refrigeration units and the recycling of recoverable metals. The amount of the incentive payments to

participants will depend on participation levels and the recommendation of the program implementation contractor.

31. The Residential Appliance Recycling program is limited to customers taking service under the Company's residential tariffs (Tariff R.S., Tariff R.S-L.M.-T.O.D., Tariff R.S.-T.O.D., and R.S.-T.O.D.-2). The initial term of the program is three years. The Company anticipates 3,000 second refrigeration units will be removed from use and disposed of in an environmentally sound fashion by the end of the initial term. The program will be evaluated during the third year of its operation.

32. Evaluation, equipment, program implementation, and other vendor services will be secured through a competitive request for proposals. An estimated budget for the three-year initial term is attached as **EXHIBIT 6**.

33. The Company projects that by the end of the initial three-year term participants will have reduced their annual energy usage by 3,105 MWh. Kentucky Power also projects a reduction of the Company's peak residential demand of 0.27 MW at the end of the initial three-year term.

34. Kentucky Power anticipates implementing the program in accordance with the following timeline:

<u>Action</u>	<u>Start</u>	<u>End</u>
Program Filing, Review, and Approval ¹	8/15/2014	1/1/2015
Vendor RFP & Contract	4/1/2014	9/30/2014
IT Setup and Integration	10/15/2014	12/30/2014
Implementation ²	1/2/2015	12/31/2017
Evaluation ³	10/3/2016	6/30/2017

Note:

1. Program filing follows DSM Collaborative Review on July 31, 2014.
2. Program implementation will begin following PSC program approval.
3. Evaluation Report to be filed August 15, 2017.

35. Further information regarding the Residential Appliance Recycling Program, including a cost-benefit analysis, is attached as EXHIBIT 6.

THE REASONABLENESS OF THE EXISTING AND PROPOSED PROGRAMS

36. In its evaluation of the Company's 2009 Integrated Resource Plan, Commission staff recommended that "Kentucky Power should work to increase its portfolio of DSM programs to assist in achieving the demand reductions targeted by AEP."⁴ In addition, the Commission's October 7, 2013 Mitchell Transfer Order approved the July 2, 2013 Stipulation and Settlement Agreement among Kentucky Industrial Utility Customers, Inc., Sierra Club, and Kentucky Power. That agreement in turn provided for a doubling of the Company's annual spending on DSM programs from approximately \$3 million in 2013 to \$6 million in 2016. Reflecting both staff comments to the Company's 2009 Integrated Resource Plan, and the requirements of the Stipulation and Settlement Agreement, the preferred portfolio under the base

⁴ Staff Report on 2009 Integrated Resource Plan of Kentucky Power Company, *In the Matter of: 2009 Integrated Resource Plan of Kentucky Power Company*, Case No. 2009-00339 at 25 (Ky. P.S.C. March 2011).

case commodity pricing scenario in Kentucky Power's 2013 Integrated Resource Plan, which is pending review by Commission staff, is projected to produce a cumulative demand reduction through DSM and energy efficiency measures of an additional 44 MW by 2028.

37. KRS 278.285(1) provides that the Commission may "determine the reasonableness of demand-side management plans proposed by any utility under its jurisdiction." The Residential Home Performance Program and the Residential Appliance Recycling Program, along with the existing programs for which re-authorization is being sought,

- (a) are intended to produce specific changes in customer consumption patterns;
- (b) are consistent with Kentucky Power's pending 2013 Integrated Resource Plan and Commission staff's comments to the Company's 2009 Integrated Resource Plan;
- (c) will not unreasonably prejudice or disadvantage any class of customers;
- (d) are available, affordable, and useful for all or a significant portion of the Company's residential customers; and
- (e) are projected to be cost-effective.

In addition, the two proposed programs are consistent with, and further the objectives of, the Stipulation and Settlement Agreement approved by the Commission as part of its Mitchell Transfer Order. As such, the existing programs for the Company seeks re-authorization, along with the two proposed programs, are reasonable and should be approved by the Commission.

TARIFFS AND DSM SURCHARGE

38. Proposed form tariffs for the Residential Home Performance Program and the Residential Appliance Recycling Program, along with the tariffs for certain of the Company's existing programs that are proposed to be modified, are attached as EXHIBIT 7 to this Application. The Company requests that its full costs associated with the two programs, as that

term is defined in the Company's Tariff D.S.M.C., be recovered through Kentucky Power's Demand-Side Management Clause (Tariff Sheets 22-1 and 22-2).

39. Kentucky Power projects total 2014 DSM/EE program expenses of \$4,078,181. This projection includes actual expenditures for the first six months of 2014 of \$1,480,126. It also projects total program expenses of \$2,360,530 for the first six months of 2015. Both projections includes costs associated with the Company's proposed Market Potential Study.

40. To permit the recovery of program costs and lost revenues and incentives, and to permit the refund of over-recoveries of DSM program costs which occurred during July 1, 2013 to June 30, 2014, Kentucky Power proposes decreasing the residential DSM factor from \$0.001477/kWh to \$0.000383/kWh, and increasing its commercial DSM factor from \$0.000986/kWh to \$0.001473/kWh. Support for the calculation of the proposed DSM factors is provided by **EXHIBIT 8**, which includes the July 1, 2013 to June 30, 2014 fiscal year financials and the projected July 1, 2014 to June 30, 2015 fiscal year financials presented in the manner utilized in connection with Exhibit C.

41. Kentucky Power does not propose as part of this Application any other modifications to its Demand-Side Management Clause or its DSM tariffs.

MARKET POTENTIAL STUDY

42. On April 15, 2014, Kentucky Power issued a Request for Proposals ("RFP") to receive bids to conduct on behalf of the Company a market potential study. Kentucky Power awarded the contract on August 6, 2014 to Applied Energy Group, Inc. to perform the market potential study, with the final report being issued August 15, 2015.

43. The Company will utilize the results of the market potential study to expand its DSM/EE offerings in conjunction with the requirement of Paragraph 12 of the July 2, 2013 Stipulation and Settlement Agreement that it increase its expenditures on cost-effective demand-side management and energy efficiency measures to \$5,000,000 in 2015 and \$6,000,000 in 2016.

Testimony

44. The testimony of Ranie K. Wohnhas is filed in support of this application.

Exhibits

45. The exhibits listed in the Appendix to this Application are attached to and made a part of this Application.

Communications

46. The Applicant respectfully requests that communications in this matter be transmitted electronically to:

Mark R. Overstreet
STITES & HARBISON PLLC
moverstreet@stites.com

Kentucky Power Company
Kentucky_regulatory_services@aep.com

ON BEHALF OF KENTUCKY POWER

WHEREFORE, Kentucky Power Company requests that the Commission issue an Order:

- (1) granting the Company authority to implement its proposed Residential Home Performance Program and its Residential Appliance Recycling Program;
- (2) authorizing Kentucky Power to discontinue its Residential and

Commercial HVAC Diagnostic and Tune-Up Programs;

(3) re-authorizing certain of Kentucky Power's existing Demand-Side Management programs as modified for the periods further described in this Application;

(4) approving the modification of Kentucky Power residential DSM factor to \$0.000383/kWh and the increase of its commercial DSM factor to \$0.001473/kWh to permit the Company's recovery through its Demand-Side Management Clause of its full costs, including lost revenues and incentives, associated with both the Company's existing programs and the two proposed programs; and

(5) granting all other required relief or approvals.

This 14th day of August, 2014.

Respectfully submitted,



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COUNSEL FOR:
KENTUCKY POWER COMPANY

LIST OF EXHIBITS

- EXHIBIT 1: August 12, 2014 “Certificate of Existence” for Kentucky Power Company issued by the Secretary of State of the Commonwealth of Kentucky.
- EXHIBIT 2: Applied Energy Group, Inc. “2012-2013 Demand-Side Management Portfolio Evaluation.”
- EXHIBIT 3: DSM/EE Status Report.
- EXHIBIT 4: Minutes of the July 31, 2014 Kentucky Power Company Collaborative meeting.
- EXHIBIT 5: The estimated expenditure budget for the initial three-year term of the proposed Residential Home Performance Program and cost-benefit analysis.
- EXHIBIT 6: The estimated expenditure budget for the initial three-year term of the proposed Residential Appliance Recycling Program and cost-benefit analysis.
- EXHIBIT 7: Proposed Form Tariffs.
- EXHIBIT 8: “Schedule C.”

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate electronic copy on disc of the foregoing Application and accompanying exhibits and testimony were served as indicated below upon:

Shannon Fisk
Earthjustice
1617 JFK Boulevard, Suite 1675
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By Overnight Delivery

By Overnight Delivery

on this the 14th day of August, 2014.



Mark R. Overstreet