

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR AN ADJUSTMENT OF ITS) CASE NO: 2016-00370
ELECTRIC RATES AND FOR CERTIFICATES)
OF PUBLIC CONVENIENCE AND NECESSITY)

**DIRECT TESTIMONY OF MALCOLM J. RATCHFORD ON BEHALF OF
COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE,
BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC.**

* * * * *

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (hereinafter "CAC"), by counsel, and hereby tenders the pre-filed Direct Testimony of Malcolm J. Ratchford in support of its position in this matter.

Respectfully submitted,



IRIS G. SKIDMORE
Bates and Skidmore
415 W. Main St., Suite 2
Frankfort, KY 40601
Telephone: (502)-352-2930
Facsimile: (502)-352-2931

COUNSEL FOR CAC

1 **Q: Please state your name and address and describe your current position and**
2 **professional background.**

3 A: My name is Malcolm J. Ratchford and I have served as Executive Director of
4 Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties
5 (“CAC”) since 2013. CAC operates 32 neighborhood and community centers, child
6 development centers in six counties, and Administrative and Support Services offices located at
7 710 W. High Street in Lexington, Kentucky.

8 I have worked in the Community Action Network for over 21 years. Before my
9 appointment as Executive Director, I held the position of Senior Manager for Neighborhood and
10 Community Services for CAC. In that position, I implemented self-sufficiency programs for the
11 low-income populations of the areas we serve.

12 I graduated from the University of Kentucky with a Masters degree in Family Studies,
13 Early Childhood Education and hold a Bachelors degree in History Pre-Law from Talladega
14 College. As Executive Director, I have participated in other cases before the Kentucky Public
15 Service Commission on behalf of utility customers with low-incomes. Based upon my
16 experience at CAC and within the Community Action Network, I am well-informed of the issues
17 and concerns of the low-income populations for which we are advocating in this matter.

18 **Q: Please describe the purpose of your testimony.**

19 A: The purpose of my testimony is to state the position of CAC with respect to the proposed
20 Kentucky Utilities Company (“KU”) rate increase and to provide information as to the
21 effectiveness of current and proposed solutions to problems of rate affordability. In summary,
22 we do not believe that a 6.4% rate increase for residential customers, as currently proposed by
23 KU, is a reasonable or appropriate expectation for customers with low-incomes, especially as
24 poverty levels remain at near-record high levels. My intent is to demonstrate that a rate increase,

1 as proposed, will have a crippling effect on the low-income customers within KU's territory. I
2 will also advocate against the proposed \$11.25 increase in the customer charge because a smaller
3 percentage of the average bill can be controlled by decreased consumption and conservation.

4 My testimony will provide a perspective that represents issues that should be given full
5 consideration in rendering a decision on this case. I am an advocate on behalf of customers with
6 low-incomes. CAC is a low-income services, development, and advocacy organization.

7 **Q: Please describe the organization of CAC and give a brief description of its activities.**

8 A: CAC was established in 1965 as a not-for-profit community action agency of the
9 Commonwealth of Kentucky. CAC is the designated community action agency for Lexington-
10 Fayette, Bourbon, Harrison, and Nicholas counties in Central Kentucky. CAC's governance
11 includes a Board of Directors representing low-income, public, and private sectors of the
12 community. Its mission states "Community Action Council prevents, reduces and eliminates
13 poverty among individuals, families and communities through direct services and advocacy."

14 There are approximately 280 employees operating and administering CAC's primary
15 programs and services including:

- 16 • self-sufficiency
- 17 • early childhood development/school readiness programs
- 18 • homeless programs
- 19 • volunteer programs
- 20 • youth development
- 21 • transportation services
- 22 • housing
- 23 • energy assistance and conservation programs
- 24 • emergency assistance
- 25 • adult education and employment assistance
- 26 • community outreach and referrals.

27
28 Although CAC's core service territory includes Lexington-Fayette, Bourbon, Harrison
29 and Nicholas counties, CAC also provides services in other Kentucky counties. For example,
30 CAC administers the WinterCare Energy Fund providing services across most of the state; child

1 development services extend into Scott and Madison counties; and the Retired and Senior
2 Volunteer Program extends into Jessamine County. The Columbia Gas Energy Assistance
3 Program and WarmWise program and KU's Home Energy Assistance Program each provide
4 services throughout the service territory of their respective utilities.

5 CAC is uniquely positioned to speak on behalf of low-income populations with utility-
6 related problems as staff members have extensive contact with and knowledge of this population.
7 Additionally, staff members are able to help participants access other CAC assistance programs
8 as well as other community resources to address the multiple obstacles and barriers that most
9 households with low-income face. This comprehensive approach provides greater stability and
10 self-sufficiency to these households, supporting a family's ability to afford necessities such as
11 utility service.

12 CAC is a member of Community Action Kentucky (CAK), a membership organization
13 that represents Kentucky's 23 community action agencies throughout the state. While CAK has
14 not intervened in this case, as a member of the organization CAC is able to communicate
15 regularly and as needed to discuss matters impacting customers with low-income served by other
16 community action organizations and thus representing a broader geographic area.

17 **Q: Please describe in detail CAC's programs and services, especially those which**
18 **partner with public utilities.**

19 A: CAC creates opportunities for individuals and families to become self-sufficient members
20 of the community, and serves the low-income population through advocacy, service delivery and
21 community involvement.

22 CAC operates **Head Start, Early Head Start** and **Migrant Head Start** child
23 development programs that have been recognized nationally. CAC also operates several housing
24 programs, including an **Emergency Family Housing** initiative in Lexington-Fayette, and five

1 **Continuum of Care** projects funded by the Department for Housing and Urban Development.
2 Another housing program offered is **Tenant Based Rental Assistance (TBRA)**, which provides
3 rental assistance to Section 8-eligible households throughout CAC's service area.

4 To support economic independence, CAC offers a **Financial Fitness** consumer education
5 program that provides training on financial management and offers families the chance to save
6 for a home, small business or higher education. CAC's **PREPared Workshops** offer
7 participants job readiness skills and customer service training. Also, each year CAC provides tax
8 preparation and education for thousands of households on the **Earned Income Tax Credit**
9 **(EITC)** and how to obtain the benefit.

10 Other programs include senior volunteerism projects **Retired and Senior Volunteer**
11 **Program (RSVP)** and the **Foster Grandparents Program (FGP)**.

12 CAC also operates a number of utility assistance programs in partnership with local
13 utilities, public and private funding sources, and other community action agencies across the
14 state. These programs are described below.

15 In 1983, CAC initiated, with KU, the establishment of the **WinterCare Energy Fund**.
16 CAC has provided administrative services, financial management and marketing support for the
17 Fund since that time. CAC has also managed the federal **LIHEAP** program (Low-Income Home
18 Energy Assistance Program) serving low-income customers in Fayette, Bourbon, Harrison and
19 Nicholas counties since its inception.

20 Since 1978, CAC has operated the Federal **Weatherization Assistance Program**
21 designed to help low-income individuals and families conserve energy. CAC operates several
22 additional weatherization and furnace replacement programs including Kentucky Utilities'
23 **WeCare** and Columbia Gas of Kentucky's **WarmWise** high-efficiency furnace replacement
24 program for their customers with low-income.

1 CAC administers a utility-funded energy subsidy program serving 2,000 low-income
2 households in partnership with the **Columbia Gas of Kentucky Energy Assistance Program**
3 **(EAP)** and the network of community action agencies serving the Columbia Gas service
4 territory.

5 CAC implemented and administers the **Kentucky Utilities Home Energy Assistance**
6 **(HEA) Program**, which serves approximately 2,700 KU customers whose primary heat source
7 is KU electricity, by providing regular monthly subsidies throughout the winter and summer
8 peak usage months.

9 **Q: Are there initiatives in which Community Action Council partners with KU or**
10 **LG&E? Please discuss.**

11 A: CAC operates the WeCare demand side management program for low-income residential
12 KU customers in its core counties providing intake, energy audits, and installation of
13 weatherization measures.

14 As described above, CAC also partners with KU on the Home Energy Assistance
15 program that provides monthly subsidies for eligible low-income customers during peak heating
16 and cooling months.

17 CAC administers contributions from KU customers and matching corporate funds from
18 KU for WinterCare energy assistance. The funds are available throughout the KU service
19 territory through the community action agency network.

20 Also, CAC and KU annually co-sponsor the Winterblitz event in Lexington, which
21 provides minimal weatherization measures in low-income homes. The Winterblitz program
22 recruits and trains volunteers who then install low-impact weatherization measures for low-
23 income individuals and families.

1 **Q: Please describe the low-income population in the Kentucky Utilities service**
 2 **territory.**

3 A: Based on customer data by county, provided by KU in response to Data Request 1 of
 4 CAC’s Initial Request for Information, and data taken from the U.S. Census Bureau, Small Area
 5 Income and Poverty Estimates (SAIPE) Program, 2015 Poverty and Median Household Income
 6 Estimates– the most recent county-level poverty data available – the following chart provides
 7 poverty status by county for KU service counties in Kentucky. The chart is in alphabetical order
 8 by county.

County	Number of KU customers	Poverty rate for county (SAIPE 2015)	Number of KU customers living in poverty
ADAIR	2,000	27.2	544
ANDERSON	5,740	10.7	614
BALLARD	1,811	15.1	273
BARREN	1,074	19.3	207
BATH	2,001	24.9	498
BELL	10,843	44.7	4,847
BOURBON	4,457	14.8	660
BOYLE	9,174	17.2	1,578
BRACKEN	2,153	15.7	338
BULLITT	589	9.6	57
CALDWELL	1,036	18.8	195
CAMPBELL	468	14.4	67
CARLISLE	13	14.8	2
CARROLL	2,910	17.6	512
CASEY	1,272	25.1	319
CHRISTIAN	705	20.3	143
CLARK	11,817	15.4	1,820
CLAY	1,481	46.8	693
CRITTENDEN	2,113	19.2	406
DAVISS	1	14.9	0
EDMONSON	19	20.0	4
ESTILL	2,430	28.2	685
FAYETTE	128,846	19.1	24,610

FLEMING	1,642	20.0	328
FRANKLIN	2,593	13.7	355
FULTON	21	30.4	6
GALLATIN	1,188	15.0	178
GARRARD	3,197	17.0	543
GRANT	169	16.4	28
GRAYSON	2,694	22.9	617
GREEN	1,052	20.5	216
HARDIN	17,467	15.0	2,620
HARLAN	10,774	35.5	3,825
HARRISON	3,138	16.2	508
HART	2,876	22.0	633
HENDERSON	2,370	17.0	403
HENRY	3,330	17.7	589
HICKMAN	712	17.6	125
HOPKINS	9,893	18.4	1,820
JESSAMINE	4,249	18.3	778
KNOX	2,699	32.0	864
LARUE	2,507	18.1	454
LAUREL	8,956	23.0	2,060
LEE	560	34.7	194
LINCOLN	3,276	21.2	695
LIVINGSTON	413	15.3	63
LYON	2,088	16.9	353
MADISON	20,077	15.2	3,052
MARION	3,346	41.5	1,389
MASON	5,525	17.3	956
MCCRACKEN	767	18.2	140
MCCREARY	1,381	20.5	283
MCLEAN	1,952	19.5	381
MERCER	6,490	15.1	980
MONTGOMERY	7,305	21.5	1,571
MUHLENBERG	11,111	19.4	2,156
NELSON	2,793	12.5	349
NICHOLAS	1,456	21.5	313
OHIO	3,873	19.9	771
OLDHAM	5,678	6.2	352
OWEN	1,593	16.9	269
PENDLETON	691	16.4	113
PULASKI	8,112	23.0	1,866

ROBERTSON	276	22.5	62
ROCKCASTLE	2,370	22.9	543
ROWAN	4,069	27.2	1,107
RUSSELL	2,103	24.6	517
SCOTT	17,590	13.1	2,304
SHELBY	11,369	11.5	1,307
SPENCER	1,693	9.0	152
TAYLOR	3,502	23.0	805
TRIMBLE	1,160	15.7	182
UNION	4,280	20.7	886
WASHINGTON	1,531	17.1	262
WAYNE	0	28.0	0
WEBSTER	2,068	18.1	374
WHITLEY	2,876	29.2	840
WOODFORD	10,387	11.6	1,205
TOTAL CUSTOMERS KENTUCKY	KU - 428,241		82,814

1
2
3
4
5
6
7
8
9
10
11
12
13
14

Many of these counties report some of the *highest poverty rates* in Kentucky. *Thirty-one counties served by KU report poverty rates above 20%*, a rate that the Census Bureau defines as *extremely high*.

Small Area Income and Poverty Estimates are considered a very reliable source to estimate poverty at the county level. Poverty and need affordability illustrates the economic equation of income versus the ability to afford the basic needs of a family. *By definition, families with incomes at or below the poverty line cannot meet their basic needs.*

Focusing on current energy affordability, thousands of families already cannot meet their basic energy needs as evidenced by the data below from CAC’s energy assistance programs in Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties administered by CAC. Between November 2016 and February 24, 2017, CAC completed 8,307 energy assistance applications, paying out \$1,381,253.95 in energy assistance. During this same time, CAC paid Kentucky

1 Utilities \$800,717.08 to help KU customers with low-incomes keep electricity coming into their
2 homes.

3 This data effectively highlights the challenges families with low-incomes already face in
4 meeting their basic needs. For a senior citizen on a fixed income, utility service is not only a
5 basic need, it is a survival need. With more money needed for utilities, there is less money for
6 other basic needs like food, housing, medication, and other necessities. These demands stretch a
7 family's resources beyond what can be sustained. The energy assistance needs cited above
8 represent the *current situation* (based on current KU rates). With the proposed rate increase, the
9 affordability gap will greatly widen.

10 **Q: Describe other challenges faced by customers with low-incomes.**

11 **A:** Low income households, as all households, require food, shelter, medication, water, heat,
12 and electricity. The stress of the rising costs and rate increases associated with these basic needs
13 stretches the resources of a family living in poverty beyond what it can sustain.

14 Food security is another issue that impacts many low-income families. According to the
15 United States Department of Agriculture Economic Research Service (USDA ERS), 12.7 percent
16 of households in America reported having low or very low food security in 2015. This means
17 that nearly 15.8 million households in America lacked the resources to access enough healthy
18 and nutritious foods for all members of the family to enjoy an active and healthy life. In
19 Kentucky, the picture of food security is even more harrowing. During the three-year period
20 2013-2015, 17.6 percent of all households in Kentucky reported low or very low food security.
21 7.3 percent of Kentucky households, or more than 132,860 households, had very low food
22 security, meaning that at least one person experienced hunger at some point during the year.

23 Families with low-income may face a number of barriers in providing enough food to
24 feed their families, such as lack of access to transportation, distance to food retailers, and rising

1 food costs. The rising cost of food is a reality for us all, but for households with low-income, the
2 increased cost of food is a very serious burden.

3 The aforementioned challenges faced by low-income customers is illustrative of how this
4 proposed rate increase coupled with other rising costs and rate increases can and will affect
5 families with low-income in complex ways.

6 **Q: Please describe how the proposed rate increase will affect people with low-income.**

7 A: In response to the Attorney General’s Initial Request for Information, Question 8, KU
8 stated that it conducted no studies addressing the impact of the proposed rate design on the
9 elderly, low income, fixed income, and home bound segments of the ratepayer base.

10 In response to CAC data requests, KU reported 428,241 customers in 77 Kentucky
11 counties. Small Area Income and Poverty Estimates poverty rates by county (see above); CAC
12 has calculated that 82,814 of current KU customers have poverty level incomes. This represents
13 19.3 percent of all KU customers.

14 As the chart below documents, the cumulative effect of the proposed KU increase of
15 \$85.92 annually per household (\$7.16 monthly * 12 months) is to charge **\$7,115,378.88** more
16 each year to households with incomes at or below the poverty line.

17

# of <u>Households</u> with Incomes Below the Poverty Line	Proposed Annual Rate Increase Per <u>Household</u>	KU Cost to <u>Households</u> Living in Poverty
82,814	\$85.92	\$7,115,378.88

18

19 It is important to consider the context of these numbers. These 82,814 households have
20 incomes *below basic survival needs* (housing, food, etc.). These households will now be
21 expected to collectively find an additional **\$7,115,378.88** to maintain an essential service:
22 electricity. With many customers turning to energy assistance programs or simply not able to pay

1 these higher bills, the Company is likely to see increased disconnections for nonpayment and
2 uncollectible arrearages, thus impacting the overall costs to all customers.

3 Current energy assistance resources will not meet this need. A rate increase as proposed
4 will have a devastating impact on families living in poverty, those with already limited resources.
5 If the energy affordability gap continues to widen as a result of the outcome of this case, families
6 will be forced to make choices about which basic needs they can afford. Families are already
7 struggling to make ends meet. Many have to make difficult choices among food, housing,
8 medicine and other necessities. With a rate increase of this magnitude, the ability of these
9 families to afford their basic needs will significantly deteriorate. The added stress of further
10 stretching limited resources becomes an increasing barrier to economic opportunity and self-
11 sufficiency. For those who have made some strides in increasing their incomes, many will be
12 forced backwards in their efforts to meet the basic needs of their families.

13 **Q: Please describe how the proposed basic service charge increase will affect people**
14 **with low-income.**

15 A: The proposed basic service charge (customer charge) increase will greatly add to the
16 burden of a rate increase on low-income customers. From 2011 until 2016, the KU basic service
17 charge increased from \$8.50 to \$10.75 per month. (See KU's response to Data Request 9 of
18 CAC's Initial Request for Information).

Year	Monthly Basic Service Charge
2011	\$8.50
2012	\$8.50
2013	\$10.75
2014	\$10.75

2015	\$10.75
2016	\$10.75
Proposed Charge	\$22.00

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

The KU proposal to increase the basic service charge to \$22.00 per month would be an \$11.25 increase in just one year. Not only is this a large increase, but also because the basic service charge is a flat-rate charge for all customers not based upon usage, a smaller percentage of the bill can be controlled by energy usage and conservation. Customers have less incentive to conserve to lower their bills.

A customer with low-income, who is forced to make difficult decisions about how to utilize sparse monies for basic needs, is less able to adjust his/her habits in order to affect the amount of a utility bill when a large percentage of the rate increase is placed in the basic service charge. A large increase in the basic service charge will penalize low-income seniors and other low-income customers by limiting their ability to control their bills through decreased usage and energy efficiency.

Q: Are resources for energy assistance sufficient to meet the needs of the population in the Kentucky Utilities service territory? Please discuss.

A: No, resources are not sufficient to meet the needs of the population. Federal LIHEAP funding to the state has been highly variable and Congressional support varies annually. The WinterCare Energy Fund, while showing some growth in revenue due to increased Company contributions, remains inadequate to bridge the gap between public assistance programs and actual need.

CAC very much appreciates KU's willingness to partner with CAC in programs to assist low income families. The contribution of additional KU shareholder dollars to these programs

1 over the last two years has increased CAC's ability to assist families living in poverty. However,
2 there continues to be a significant gap between the cost of utility service and the ability of the
3 elderly, the working poor, and other households with low income to pay. Current energy
4 assistance initiatives within the KU area do not come close to addressing this gap. Each year,
5 Community Action Council is forced to turn away hundreds of families who urgently need
6 energy assistance for lack of available funds.

7 **Q: Is KU's HEA subsidy program, operated in partnership with CAC, still an effective**
8 **means for reducing the affordability gap? Why or why not?**

9 A: In 2013, the HEA Subsidy amount was increased to \$88 per customer per month during
10 the seven (7) peak months designated in the program. While this has been helpful to HEA
11 participants, it has not been sufficient to ease the burden of utility costs for customers with low
12 income.

13 As noted in the Company's response to data requests, the average monthly invoice in
14 2012 was \$96.93, and by 2016 that average had increased to \$115.65. The increase of \$18.72 in
15 just four years reduces the assistance intended by the \$44.00 increase in the subsidy amount per
16 customer granted in 2013. In the event of a rate increase, an HEA subsidy that remains
17 unchanged would make even less of an impact on the financial strain felt by low-income
18 customers.

19 Additionally, the wait-list for low-income people seeking an HEA subsidy is substantial.
20 As of February 24, 2017, over 1,038 eligible people were on the HEA subsidy wait-list for the
21 CAC service territory. This demonstrates a great need for the HEA program to serve more
22 participants, despite its best efforts.

23 **Q. What impact would the Company's proposed full deployment of its Advanced**
24 **Metering System have on the low income community?**

1 A. In short, CAC does not believe that the low income community will benefit from the
2 proposed full deployment of the Advanced Metering System. According to KU’s testimony, the
3 “other large driver of savings results from customers using less energy and using it more
4 efficiently as they learn more about their own usage from the web portal that will be available to
5 them as part of the AMS deployment.” While CAC recognizes advancements in meter reading
6 technology, the fact remains that many low income households, which include seniors and the
7 elderly, do not have in-home access to the technology needed, such as computers and regular or
8 reliable internet access, to access the web-based portal in order to benefit from energy
9 conservation elements identified by KU. In response to Sierra Club’s Initial Data Requests,
10 Question 32, KU stated that it assumes that 17 percent of residential customers will be “active
11 users” with energy savings of 3 percent. Low income customers will likely be a very small
12 proportion of that number.

13 KU stated in its response to Sierra Club’s Initial Request for Information, Question 30,
14 that “faster disconnections is not a goal of the AMS Program” and that the same protections
15 currently in place will remain. CAC urges the Commission to carefully consider the CPCN for
16 full deployment of the Advanced Metering System and require KU to both protect low income
17 households from the disadvantages of instantaneous disconnections and offer low income
18 households realistic opportunities to benefit from the technology.

19 **Q: What do you propose as a solution in this case?**

20 **A:** CAC asks the Commission to approve the lowest possible rate increase in order to avoid
21 placing additional burden on families with low-income. As previously discussed, customers with
22 low-income are already unable to meet minimum financial needs for basic services like food and
23 medicine. Continuing to widen the affordability gap will place thousands of Kentuckians at risk
24 of illness and death from exposure to extreme temperatures as shutoffs increase.

1 For the same reasons, CAC also urges the Commission to approve the lowest possible
2 basic service charge increase. While we understand the necessity of the basic service charge to
3 support KU's operations, placing such a large percentage of the rate increase in the basic service
4 charge poses a heavy burden on low-income customers who are faced not only with the prospect
5 of a high energy bill, but also with a decreased incentive to make a meaningful impact on their
6 monthly bills through usage and energy conservation.

7 In order to effectively reduce the burden placed on families with low-income, CAC asks
8 the Commission and the Company to seek a solution that increases funding available for the
9 HEA subsidy program for the purposes of increasing the winter and summer monthly subsidy
10 amounts and the number of customers served. This would allow those most vulnerable, including
11 the elderly, those with disabilities, and families with children, access to a more effective solution
12 for keeping up with their heating and cooling costs. It would also serve to diminish the long wait-
13 list of eligible customers seeking HEA subsidies.

14 **Q: In summary, please state your position regarding KU's proposal for an increase in**
15 **the electric service charge rate?**

16 The requested rate increase is too high and will negatively affect the ability of customers
17 with low-income to pay for essential services. CAC urges the Commission to consider a much
18 lower rate increase and basic service charge than proposed by KU. CAC asks that all parties
19 collaborate for a solution that will allow an increase in the amounts of the monthly subsidies in
20 the HEA program and an increase in the number served to prevent low income customers from
21 being unable to afford their monthly electric bill.

CERTIFICATE OF SERVICE

I hereby certify that CAC's March 3, 2017 electronic filing is a true and accurate copy of Direct Testimony of Malcolm J. Ratchford on Behalf of CAC to be filed in paper medium; that the electronic filing has been transmitted to the Commission on March 3, 2017; that an original and six copies of the filing will be delivered to the Commission on March 3, 2017; that there are currently no parties excused from participation by electronic service; and that, on March 3, 2017, electronic mail notification of the electronic filing is provided to the following:

Robert Conroy
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202
Robert.Conroy@lge-ku.com

Kentucky Utilities Company
220 W. Main Street
P.O. Box 32010
Louisville, KY 40232-2010

Kendrick R. Riggs, Esq.
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
kendrick.riggs@skofirm.com

Allyson K. Sturgeon, Esq.
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KY 40202
Allyson.Sturgeon@lge-ku.com

Rebecca W. Goodman, Esq.
Office of the Attorney General
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601-8204
Rebecca.Goodman@ky.gov

Lawrence W. Cook, Esq.
Office of the Attorney General
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601-8204
Larry.Cook@ky.gov

Angela M. Goad, Esq.
Assistant Attorney General

Office of the Attorney General Office of Rate
700 Capital Avenue, Suite 20
Frankfort, KY 40601

Kent Chandler, Esq.
Office of the Attorney General
700 Capital Avenue, Suite 20
Frankfort, Kentucky 40601-8204
Kent.Chandler@ky.gov

Michael L. Kurtz, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
MKurtz@bkllawfirm.com

Kurt J. Boehm, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Kboehm@bkllawfirm.com

Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

Robert C. Moore, Esq.
Stites & Harbison PLLC
421 W. Main Street
P.O. Box 634
Frankfort, KY 40602-0634
rmoore@stites.com

David J. Barberie, Managing Attorney
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, Ky 40507
dbarberi@lexingtonky.gov

Andrea C. Brown, Esq.
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, Ky 40507

Janet M. Graham, Esq.
Commissioner of Law
Lexington-Fayette Urban County Government
Department of Law
200 East Main Street
Lexington, Ky 40507

Barry Alan Naum, Esq.
Spillman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PA 17050

Carrie M. Harris, Esq.
Spillman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PA 17050

Don C A Parker, Esq.
Spillman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PA 17050

Gardner F. Gillespie, Esq.
Sheppard Mullin Richter & Hampton LLP
1300 I Street NW
11th Floor East
Washington DC 20005

Carrie A. Ross, Esq.
Sheppard Mullin Richter & Hampton LLP
1300 I Street NW
11th Floor East
Washington DC 20005

James W. Gardner, Esq.
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

Janice Theriot, Esq.
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Street
Louisville, KY 40202

Lawrence Zielke, Esq.
Zielke Law Firm PLLC

1250 Meidinger Tower
462 South Fourth Street
Louisville, KY 40202

Paul Werner, Esq.
Sheppard Mullin Richter & Hampton LLP
1300 I Street NW
11th Floor East
Washington, DC 20005

M. Todd Osterloh, Esq.
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KY 40507

Casey Roberts, Esq.
Sierra Club
1536 Wynkoop St., Suite 312
Denver, Colorado 80202

Joe F. Childers, Esq.
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KY 40507

Cheryl Winn, Esq.
Waters Law Group PLLC
12802 Townepark Way, Suite 200
Louisville, KY 40243

Gregory T. Dutton, Esq.
Goldberg Simpson LLC
9301 Dayflower Street
Louisville, KY 40059

Laura Milam Ross
Kentucky League of Cities
101 East Vine Street
Suite 800
Lexington, KY 40507

Matthew Miller, Esq.
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DC 20001

Erin M. Nelson

Counsel for CAC