

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

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
REASONABLENESS OF THE DEMAND SIDE)	CASE NO. 2017-00097
MANAGEMENT PROGRAMS AND RATES)	
OF KENTUCKY POWER COMPANY)	

**BEVERLY MAY, JIM WEBB, AND SIERRA CLUB’S MOTION FOR A MODIFIED
PROCEDURAL SCHEDULE AND INFORMAL CONFERENCE**

Pursuant to the Kentucky Public Service Commission’s (“Commission”) February 23, 2017 Order (“Order”) and Section 5 of the Commission’s Rules of Procedure, 807 KAR 5:001 § 5, Intervenors Beverly May, Jim Webb, and Sierra Club (collectively “Sierra Club”) respectfully move to modify the procedural schedule in the above-captioned docket to accommodate intervenor testimony, which Sierra Club plans to file. With the goal of reaching consensus among the parties on a proposed modified schedule, Sierra Club also requests an informal conference during the week of April 17th. In support of this motion, Sierra Club states as follows:

1. The Commission’s procedural schedule for this investigation is set forth in Appendix A of its Order. The schedule provides for two rounds of discovery and currently ends with the deadline for Kentucky Power Company (“the Company”) to file responses to supplemental data requests on June 9, 2017.

2. The Order also directs any intervening party that intends to file testimony to advise the Commission in writing of its intent to do so and, no later than April 14, 2017, to move

for modification of the procedural schedule, if necessary, to permit the filing of its testimony.
Order at 7.

3. As noted in its Motion for Leave to Intervene, Sierra Club intends to file expert testimony in this case. Sierra Club Mot. to Intervene at 5, note 9. Therefore, Sierra Club seeks to modify the procedural schedule to accommodate the filing of such testimony.

4. In light of the current procedural schedule, which sets a deadline of June 9 for the Company's responses to supplemental information requests, Sierra Club believes that intervenor testimony should be due no earlier than June 30, 2017. This timeframe will allow witnesses time to review the Company's supplemental responses and incorporate them, as needed, into testimony. Sierra Club also believes that a hearing would assist the Commission in its investigation, and that a modified procedural schedule should include a hearing date.

5. To assist the Commission in developing a modified schedule and in an effort to reach consensus among the parties on a proposed modified procedural schedule, Sierra Club requests an informal conference during the week of April 17th.

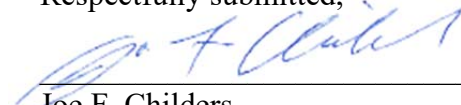
For the foregoing reasons, Sierra Club requests that the Commission modify the procedural schedule in this matter. To assist the Commission in developing a modified schedule and with the goal of reaching consensus among the parties, Sierra Club also requests an informal conference during the week of April 17th.

Dated: April 13, 2017

Of counsel
(Not licensed to practice in Kentucky)

Matthew E. Miller
Sierra Club

Respectfully submitted,



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

50 F Street, NW, Eighth Floor
Washington, DC 20001
Phone: (202) 650-6069
Fax: (202) 547-6009
Email: matthew.miller@sierraclub.org

Phone: (859) 253-9824
Fax: (859) 258-9288
Email: childerslaw81@gmail.com

Jill Tauber
Chinyere Osuala
Earthjustice
Washington, DC Office
1625 Massachusetts Ave., NW, Ste. 702
Washington, DC 20036
Phone: (202) 667-4500
Fax: (202) 667-2356
Email: jtauber@earthjustice.org
cosuala@earthjustice.org

Counsel for Beverly May, Jim Webb, and Sierra Club

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the BEVERLY MAY, JIM WEBB, AND SIERRA CLUB'S MOTION FOR A MODIFIED PROCEDURAL SCHEDULE AND INFORMAL CONFERENCE in this action is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on April 13, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being delivered to the Commission.