

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

**In The Matter Of Electronic  
Investigation Of The Reasonableness  
Of The Demand Side Management  
Programs And Rates Of Kentucky**

**Power Company**

**Case No 2017-00097**

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**KENTUCKIANS FOR THE COMMONWEALTH, INC., ELIZABETH SANDERS, AND  
ALICE WHITAKER REQUEST FOR ADDITIONAL TIME TO RESPOND TO  
KENTUCKY POWER COMPANY’S MOTION FOR AN INTERLOCUTORY ORDER**

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Comes Kentuckians For The Commonwealth, Inc. (“KFTC”), Elizabeth Sanders, and Alice Whitaker (“KFTC Movants”), by and through counsel, and ask for an additional 14 days, or until April 21, 2017, to fully respond to Kentucky Power Company’s (“KPCO”) Motion for an Interlocutory Order Regarding Program Activity During the Pendency of Investigation (“Motion”). In support of this request for additional time, KFTC Movants state as follows:

1. KFTC and its members have experience developing low-cost energy solutions for commercial and residential electricity customers throughout Eastern Kentucky. This experience includes working directly with KPCO customers to make the best use of KPCO’s DSM Programs.
2. KFTC would like additional time to respond to KPCO’s motion to better develop argument and factual support based on specific experiences KPCO’s consumers have had working with KPCO’s Demand-Side Management (“DSM”) Programs and the potential harms that could be caused by a suspension of the Programs.
3. On February 23, 2017 the Commission ordered an investigation into the DSM Programs of the KPCO. In its Order, the Commission established a schedule that assumed that discovery would be limited and anticipated that parties may intervene. To date, five parties have requested intervention including the KFTC Movants. Four of those intervention motions are currently pending.
4. KPCO filed its Motion on Friday, March 31, 2017. Any response is due on April 7, 2017. KFTC Movants ask for an additional fourteen days to respond to the Motion, which would make Responses due on April 21, 2017.
5. KPCO asks the Commission for an interlocutory order determining whether and how it should continue to fulfill its DSM Program obligations during the pendency of the investigation.
6. KPCO’s motion goes to the merits of the Commission’s investigation. KFTC Movant’s opportunity to discover facts relevant to the interlocutory relief KPCO seeks has just begun.
7. Furthermore, it is not known what DSM Programs might be affected by KPCO’s Motion.

8. Any suspension of KPCO's DSM Programs may be significantly prejudicial to KPCO's customers, particularly KPCO's commercial customers.
9. KPCO's commercial customers, some of whom work through KFTC and the Mountain Association for Community Economic Development ("MACED") to make the most of the DSM opportunities available to them, make significant business decisions in anticipation of the benefits they expect to receive through, for instance, KPCO's Commercial Incentive Prescriptive Custom Program rebates. Some of these commercial customers have already gone through the pre-application process for the incentive program and are fully anticipating that they will be able to take advantage of the offered rebates. These customers are making business decisions in reasonable anticipation of a rebate that they may not receive if the Commission were to allow KPCO to suspend its DSM Programs during this investigation.
10. In addition, significant transaction costs have been expended by KPCO and its contractors in setting up the existing DSM Program. These front-end costs include the costs of establishing and marketing the program, costs associated with the RFP process, and costs associated with vetting contractors and negotiating contracts. If the DSM Program is suspended, most of these costs would be lost.
11. Movant KFTC requests a short time extension until April 21, 2017 in which to file a substantive response to the Motion.

WHEREFORE, KFTC requests that it be granted an additional 14 days in which to respond to the Motion.

Respectfully Submitted,



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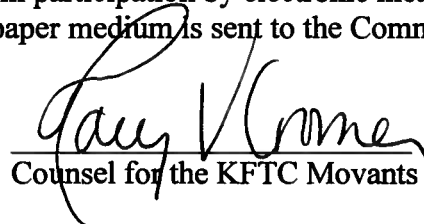
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*Counsel for the KFTC Movants*

### CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the REQUEST FOR ADDITIONAL TIME 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 6, 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 sent to the Commission via first-class United States mail on this day.



Counsel for the KFTC Movants