



David Webster,
President

Kerri Schelling,
Executive Director

January 9, 2018

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

Re: Case No. 2017-00097

IN THE MATTER OF: ELECTRONIC INVESTIGATION OF THE REASONABLENESS
OF THE DEMAND SIDE MANAGEMENT PROGRAMS AND RATES
OF KENTUCKY POWER COMPANY

Director Pinson:

The Kentucky School Boards Association (KSBA)¹ requests the Commission authorize Kentucky Power Company to provide reimbursement for school district energy efficiency projects (hereinafter "Projects") listed on the Company's Response to Item 2-2d (KPCO_R_KPSC_2_2_Attachment1) to the Commission Staff's Second Set of Data Requests. KSBA is not an intervenor in this proceeding, but has been asked by the affected districts to submit this statement on their behalf as public comment.

The following school districts have one or more projects for which they completed the Company's Commercial Incentive Program Application: Boyd, Breathitt, Johnson, Magoffin, Knott and Perry County Public Schools and Hazard and Pikeville Independent Schools. The Projects fall within one of the three categories listed on the Response Attachment: "Pending Kentucky Power Final Approval", "Waitlist", or "Pre-Review" identifying some \$420,000 of outstanding school rebates. More succinctly, the Projects are either: 1) completed pending reimbursement, 2) completed pending paper work completion; or 3) in progress.

Kentucky public school districts are subject to KRS § 160.325 which mandates development and implementation of energy management plans and annual reporting to the General Assembly and Executive Branch on the status of the development of the energy management plans and the anticipated savings to be obtained from those plans. To facilitate statutory compliance, districts implement energy efficiency projects, many of which are justified in part by utility rebates as is the case with the Projects herein being initiated based on the representation that they qualified for receipt of rebates to offset project costs. Without fulfillment of the expected rebates, the districts will

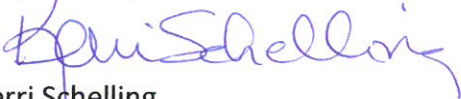
¹ The Kentucky School Boards Association (KSBA) is a nonprofit corporation of school boards from each public school district in Kentucky. The association, founded in 1936, now has over 75 years of serving school board members and school districts in such areas as governmental relations, board member and team development, risk management, facility planning, energy management, legal services, policy services, publications and community relations. It is governed by a 27-member board of directors made up of representatives elected as regional chairpersons or as directors-at-large. With nearly 900 school board members, KSBA is the largest organization of elected officials in Kentucky.



experience significant financial harm and place programmatic as well as future energy efficiency projects at risk harming their students and communities.

KSBA and the districts understand the need for the Commission to review the Company's demand side management programs. In conducting the review KSBA respectfully requests the Commission recognize the districts' expectation of rebate receipt upon Project completion and the value of the benefit of these programs for districts' current and future statutory compliance. While Kentucky public school districts have made great strides in becoming national leaders in the efficient use of energy, there exists tremendous remaining opportunities for schools to become significantly more efficient with assistance of utility programs such as those provided by Kentucky Power.

Respectively,



Kerri Schelling
Executive Director

cc: Superintendent List

- Bill Boblett, Boyd County
- Phillip Watts, Breathitt County
- Sandra Johnson, Hazard Independent
- Thom Cockran, Johnson County
- Kim King, Knott County
- Scott Helton, Magoffin County
- Jonathan Jett, Perry County
- Jerry Green, Pikeville Independent