

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

In the matter of: : CASE NO. 2017-00179

ELECTRONIC APPLICATION OF KENTUCKY :
POWER COMPANY FOR (1) A GENERAL :
ADJUSTMENT OF ITS RATES FOR ELECTRIC :
SERVICE; (2) AN ORDER APPROVING ITS :
2017 ENVIRONMENTAL COMPLIANCE PLAN; :
(3) AN ORDER APPROVING ITS TARIFFS AND :
RIDERS; (4) AN ORDER APPROVING :
ACCOUNTING PRACTICES TO ESTABLISH :
REGULATORY ASSETS AND LIABILITIES; :
AND (5) AN ORDER GRANTING ALL OTHER :
REQUIRED APPROVALS AND RELIEF :

KENTUCKY SCHOOL BOARDS ASSOCIATION’S MOTION TO INTERVENE

Comes the Kentucky School Boards Association (“KSBA”) pursuant to 807 KAR 5:001 Section 4(11), by counsel, and moves that it be granted leave to intervene in this matter and that it be granted full intervention. In support of this Motion, KSBA states as follows:

KSBA is a nonprofit corporation of school boards from each public school district in Kentucky. KSBA serves school board members and school districts in numerous areas including but not limited to energy management and policy. KSBA 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.

KSBA has involvement with energy initiatives with its representative school boards and electric service and other energy costs represent a significant cost of representative school district budgets. KSBA has intervened in prior Kentucky Power Company (KPC) rate adjustment matters as well, namely Commission case numbers 2009-00459; and 2014-00396. As a result of a settlement with KSBA in PSC Case No. 2014-00396 (the most recent rate

adjustment matter), KPC established a pilot K-12 public school tariff giving the KPC representative school districts a cumulative \$500,000 annual net benefit versus other pre-existing tariffs. Within this current rate adjustment matter before the Commission, KPC recommends the termination of the pilot K-12 public school tariff based upon the rate of return (6.17%) being below the Rate LGS rate of return of 8.29% (*see* testimony of KPC Witness Buck and KPC Witness Vaughan). KPC states their overall rate of return to be 3.93%.

In this matter the Commission is in the process of examining the request of KPC for a general adjustment in electric rates, significant changes in its pricing structure and other matters. Approval of this application would have a significant impact on KSBA's school board districts and their budgets – especially by virtue of the proposed termination of the existing pilot. KSBA represents all of the public school boards within KPC's service territory. As such, and based upon the proposed elimination of the pilot K-12 public school tariff herein, KSBA has a special interest in this proceeding and KSBA's interests are not adequately represented by the other parties to this proceeding. KSBA will present issues and develop facts that will be helpful to the Commission in fully hearing this matter, and participation by KSBA will not unduly delay these proceedings, or unduly complicate or disrupt them. KSBA intends to present the testimony of Mr. Ronald Willhite who has extensive utility experience having worked in various rate-making capacities for Kentucky Utilities and Louisville Gas and Electric for over 30 years. KSBA is aware of the pending scheduled hearing regarding intervention (July 24th at 10:00 a.m.) referenced in the Commission's Order dated July 12, 2017 and can be prepared to present Mr. Willhite addressing KSBA's special interest if desired by the Commission.

The attorneys for KSBA authorized to represent it in this proceeding and to take service of all documents are:

Matthew R. Malone, Esq.
William H. May, III. Esq.
Hurt, Deckard & May PLLC
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)
mmalone@hdmfirm.com
bmay@hdmfirm.com

Wherefore, KSBA respectfully requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

/s/Matt Malone

Matthew R. Malone
William H. May, III.
Hurt, Deckard & May PLLC
127 West Main Street
Lexington, Kentucky 40507
(859) 254-0000 (office)
(859) 254-4763 (facsimile)
mmalone@hdmfirm.com
bmay@hdmfirm.com

Counsel for the Petitioner,
KENTUCKY SCHOOL BOARDS ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that KSBA's July 13, 2017 electronic filing is a true and accurate copy of the Motion to Intervene to be filed in paper medium; and that on July 13, 2017, the electronic filing has been transmitted to the Commission, and that an original and six copies of the filing will be delivered to the Commission, that no participants have been excused from electronic filing at this time.

/s/Matt Malone

ATTORNEY FOR KSBA