

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

In the matter of: : CASE NO. 2018-00294
APPLICATION OF KENTUCKY UTILITIES :
COMPANY FOR AN ADJUSTMENT OF ITS :
ELECTRIC RATES :
:

KENTUCKY SCHOOL BOARDS ASSOCIATION’S MOTION TO INTERVENE

Comes the Kentucky School Boards Association (“KSBA”), 260 Democrat Drive, Frankfort, Kentucky 40601 pursuant to 807 KAR 5:001 Section 4(11), by counsel, and move for full intervenor status in this action to the fullest extent permitted by law. 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 such areas including but not limited to energy 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 previously in KU rate adjustment matters namely Case No. 2016-00370, Case No. 2014-00371, Case No. 2012-00221, Case No. 2010-00204 and Case No. 2009-00548 – actively participating in all cases.

In this matter the Commission is in the process of examining the request of Kentucky Utilities Company for a general adjustment in electric rates, significant changes in its pricing structure and other matters including proposed elimination of the School Power Service (SPS)

and School Time-of-Day Service (STOD) pilot rates instituted in Case No. 2016-00370. Conversely, in this matter KSBA has an interest in the possible continuation of rates SPS and STOD in addition to the general budgetary concerns for its members. And, currently based on the Commission's entered Order on October 11, 2018 herein, rate schedules SPS and STOD continue in effect until the conclusion of the investigations in LG&E/KU's respective rate applications.¹ Approval of this application would have a significant impact on KSBA's school board districts and their budgets. KSBA represents all of the public-school boards within Kentucky Utility Company's service territory. KSBA has also addressed this rate filing with the Kentucky Non-Public School Commission (KyNPSC) and will represent the interests of their member schools as well. As such, KSBA has a special interest in this proceeding and KSBA's interests are not adequately represented by the other parties to this proceeding including that of the Attorney General. KSBA intends, at a minimum, to present the testimony of Mr. Ronald Willhite who has extensive utility experience having worked previously in various rate-making capacities for Kentucky Utilities and Louisville Gas and Electric for over 30 years. 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 along with this motion being timely.

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

Matthew R. Malone, Esq.
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¹ See Case No. 2017-00441, *Electronic Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Certain Existing Demand-Side Management and Energy Efficiency Programs*, p. 2 of Order, dated October 25, 2018.

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

Respectfully submitted,

/s/Matt Malone

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Counsel for the Petitioner,
KENTUCKY SCHOOL BOARDS ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that KSBA's October 29, 2018 electronic filing is a true and accurate copy of KSBA's pleading and Read 1st Document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on October 29, 2018; that an original and one copies of the filing will be delivered to the Commission on October 29, 2018; that there are currently no parties excused from participation by electronic service; and that, on October 29, 2018, electronic mail notification of the electronic filing is provided to the following:

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