COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In The Matter Of:

The Electronic Application Of Kentucky
Power Company To: (1) Modify Kentucky Power
Company's Residential Energy Assistance
Program; (2) Approve The Amended Operating
Agreement; and (3) Grant All Other Relief To
Which It May Be Entitled

Case No. 2019-00245

DIRECT TESTIMONY OF

BRIAN K. WEST

ON BEHALF OF KENTUCKY POWER COMPANY

DIRECT TESTIMONY OF BRIAN K. WEST ON BEHALF OF KENTUCKY POWER COMPANY BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

CASE NO. 2019-00245

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DIRECT TESTIMONY OF BRIAN K. WEST ON BEHALF OF KENTUCKY POWER COMPANY

I. <u>INTRODUCTION</u>

1 Q. PLEASE STATE YOUR NAME, POSITION, AND BUSINESS ADDRESS.

A. My name is Brian K. West. My position is Director of Regulatory Services, Kentucky
Power Company ("Kentucky Power" or the "Company"). My business address is 855
Central Avenue, Suite 200, Ashland, Kentucky 41101.

5 Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL 6 BACKGROUND.

A. I received an Associate's degree in Applied Science (Electronics Technology) and a
Bachelor's degree in Business Management, both from Ohio University, in 1987 and
1988, respectively. I obtained a Master of Business Administration degree from Ohio
Dominican University in 2008.

11 I began my utility industry career when I joined Ohio Power Company as a 12 customer services assistant in Portsmouth, Ohio in 1989. This was a supervisor-in-13 training position, where I worked in each area of the office (e.g., cashiering, new service, 14 and credit and collections) to gain knowledge and experience with every aspect of 15 managing an area office. After completing the training program, I initially supervised 16 meter readers in the Portsmouth office until being promoted to office supervisor in 1993. 17 In 1997, when the area offices were closed, I transferred to Chillicothe, Ohio and 18 accepted the position of customer services field supervisor, with responsibility for 19 managing customer field representatives who primarily worked with customers on high-20 bill and other inquiries.

In 2000, after American Electric Power Company ("AEP") merged with Central and South West Corporation ("CSW"), I moved to Columbus, Ohio, where I held various positions in Customer Operations, mostly in process improvement and supporting regulatory filings. In 2008, I transferred to AEP's Regulatory Services department, where I supported various filings before public service commissions in Arkansas, Indiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia, and West Virginia, as well as the Public Service Commission of Kentucky ("Commission").

In 2010, I was promoted to regulatory case manager, with responsibility for energy efficiency/demand response filings, integrated resource plan filings, and various renewable filings across AEP's service territory. In 2016, I moved to a case manager role with primary responsibility for most Appalachian Power Company filings before the Public Service Commission of West Virginia, the Virginia State Corporation Commission, and the Tennessee Public Utility Commission. I assumed my current position as Director of Regulatory Services for Kentucky Power in February 2019.

Q. WHAT ARE YOUR RESPONSIBILITIES AS DIRECTOR OF REGULATORY SERVICES FOR KENTUCKY POWER?

A. I am responsible for the supervision and direction of Kentucky Power's Regulatory Services Department, which has responsibility for all rate and regulatory matters involving the Company.

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Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN ANY REGULATORY PROCEEDINGS?

A. Yes. I have submitted testimony in Case No. 2019-00140 on behalf of the Company in
 support of its monthly environmental surcharge filings during the six-month review

period July 1, 2018 through December 31, 2018, correlating to billing months May 2018
 through October 2018.

II. <u>PURPOSE OF TESTIMONY</u>

3 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

- 4 A. The purpose of my testimony is to describe Kentucky Power Company's Tariff R.E.A.
- 5 (Residential Energy Assistance) and support the appropriateness of proposed changes to
- 6 the Home Energy Assistance in Reduced Temperatures ("HEART") and Temporary
- 7 Heating Assistance in Winter ("THAW") programs, which are funded through Tariff
- 8 R.E.A. I also address corresponding changes to the operating agreement between
- 9 Kentucky Power and Community Action Kentucky, Inc. ("CAK"). CAK, and its local
- 10 community action agencies ("CAAs"), administer the HEART and THAW programs.

11 Q. ARE YOU SPONSORING ANY EXHIBITS?

12 A. Yes. I am sponsoring <u>EXHIBIT BKW-1</u>, which illustrates the leaflet that HEART and
 13 THAW applicants will receive.

14 Q. WAS YOUR EXHIBIT PREPARED BY YOU OR UNDER YOUR DIRECTION? 15 A. Yes.

III. RESIDENTIAL ENERGY ASSISTANCE

16 Q. PLEASE PROVIDE BACKGROUND ON KENTUCKY POWER'S 17 RESIDENTIAL ENERGY ASSISTANCE PROGRAM.

- 18 A. Kentucky Power's home energy assistance program began in December 2006. The
 19 program was modified and expanded in October 2018, in accordance with the
 20 Commission's October 30, 2018 Order in Case No. 2018-00311.
- 21 HEART is designed to assist low-income Kentucky Power residential customers

1	with their electric bills. The program year begins each January and runs through April of
2	the same year. Participating customers receive monthly credits (\$115.00 per month for
3	customers who heat with electricity and \$58.00 per month for non-electric heating
4	customers) on their Kentucky Power bills rendered during January, February, March, and
5	April for the winter heating season months.
6	THAW is designed to help customers who do not require the broader and more
7	sustained help provided by HEART, but who nonetheless are at risk of losing their
8	electric service because of a temporary situation. THAW offers assistance credit of up to

9 a total of \$175.00 per winter heating season (bills rendered January through April), or
10 until allocated benefits are expended to eligible residential customers on a first come, first
11 served basis.

Customers enrolled in one program are ineligible to receive benefits from the other. The two programs are designed to meet two different types of need. HEART is directed at those customers who require more sustained assistance. THAW, by contrast, is designed for those customers who can benefit from more limited or one-time assistance. By limiting participation to only one program during a calendar year, the Company is able to assist a larger number of customers than it would otherwise if customers could receive benefits under both programs.

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Q. HOW ARE THE PROGRAMS FUNDED?

A. Tariff R.E.A. provides for a \$0.30 monthly meter charge to all residential customers. The
 proceeds of this charge are matched dollar-for-dollar with contributions from Kentucky
 Power. The Company's contributions are paid by the Company's shareholder and not
 customers.

1		Seventy-five percent of the total available funds collected through the R.E.A.
2		surcharge are used to support HEART. The remaining twenty-five percent of funds
3		support THAW. Eighty-five percent of the total available funds are used to provide
4		assistance to participants who use electricity as their primary source of heat. The balance
5		is used to fund assistance to non-electric heating residential customers.
6		A subset of HEART, called Donation HEART, is funded via voluntary customer
7		donations, accompanied by an annual Company match of up to \$20,000, starting with the
8		2020 program year. These funds are segregated from the HEART and THAW funds
9		collected through the R.E.A. surcharge, and are administered in accordance with the
10		requirements of KRS 278.287.
11	Q.	DOES KENTUCKY POWER DIRECTLY ADMINISTER ITS HEART AND
12		THAW PROGRAMS?
12 13	A.	THAW PROGRAMS? No. Kentucky Power partners with CAK to administer the HEART and THAW
	A.	
13	A.	No. Kentucky Power partners with CAK to administer the HEART and THAW
13 14	A.	No. Kentucky Power partners with CAK to administer the HEART and THAW programs. CAK in turn works through five CAAs. A customer seeking assistance
13 14 15	A.	No. Kentucky Power partners with CAK to administer the HEART and THAW programs. CAK in turn works through five CAAs. A customer seeking assistance through either program must apply to his or her local community action agency. The
13 14 15 16	A.	No. Kentucky Power partners with CAK to administer the HEART and THAW programs. CAK in turn works through five CAAs. A customer seeking assistance through either program must apply to his or her local community action agency. The agencies begin taking HEART applications each November for the upcoming program
13 14 15 16 17	A.	No. Kentucky Power partners with CAK to administer the HEART and THAW programs. CAK in turn works through five CAAs. A customer seeking assistance through either program must apply to his or her local community action agency. The agencies begin taking HEART applications each November for the upcoming program year. The CAAs begin accepting THAW applications in January. Each local community
13 14 15 16 17	А. Q.	No. Kentucky Power partners with CAK to administer the HEART and THAW programs. CAK in turn works through five CAAs. A customer seeking assistance through either program must apply to his or her local community action agency. The agencies begin taking HEART applications each November for the upcoming program year. The CAAs begin accepting THAW applications in January. Each local community action agency processes the applications and determines the recipients.
13 14 15 16 17 18		No. Kentucky Power partners with CAK to administer the HEART and THAW programs. CAK in turn works through five CAAs. A customer seeking assistance through either program must apply to his or her local community action agency. The agencies begin taking HEART applications each November for the upcoming program year. The CAAs begin accepting THAW applications in January. Each local community action agency processes the applications and determines the recipients.

22 program and four minor changes to the operation of the THAW program. The

modifications grow out of "lessons learned" during the first year of the operation of the
 programs following last year's significant changes. These programmatic changes are also
 reflected in corresponding changes to the operating agreement between Kentucky Power
 and CAK. Kentucky Power is not proposing any changes to Tariff R.E.A.

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Q. WHY IS KENTUCKY POWER PROPOSING CHANGES TO ITS HEART AND THAW ELIGIBILITY REQUIREMENTS?

7 A. Kentucky Power is committed to providing programs that deliver meaningful help to

8 customers, are administratively functional, and foster a positive customer experience.

9 Because the HEART program recently changed for the first time in over ten years, and

10 the THAW program was just established in the last year, it was especially important to

11 the Company to ensure that the updated and new programs are providing the maximal

12 benefits envisioned by Kentucky Power, CAK, and the Commission. To those ends, in

13 May 2019, the Company met with CAK and several CAAs after the 2019 program year

14 ended to discuss the HEART and THAW programs. At that meeting, the Company,

15 CAK, and the CAAs identified two general areas for program improvement to: 1)

16 alleviate administrative burden; and 2) further improve customers' experience. Based on

17 these discussions, the Company is proposing small changes to the eligibility requirements

18 for the HEART and THAW programs to achieve those objectives. The proposed

19 amendments do not, however, change the amount of benefits provided by either program.

20 Q. AS KENTUCKY POWER'S PARTNER IN ADMINISTERING THE HEART AND

21 THAW PROGRAMS, HAS CAK REVIEWED THE PROPOSED CHANGES?

A. Yes. Both CAK and the CAAs were integral in identifying several of the proposedchanges proffered by Kentucky Power.

1		Kentucky Power values the unique role CAK and CAAs perform in the
2		administration of the HEART and THAW programs; their representatives act as the face
3		of the programs. Accordingly, CAK's and CAA's agents provided insights into aspects of
4		the programs that are unavailable to the Company and were instrumental to the proposals
5		herein.
		A. Modifications to HEART Program Eligibility Requirements
6	Q.	WHAT CHANGES TO THE HEART PROGRAM ELIGIBILITY
7		REQUIREMENTS DOES THE COMPANY PROPOSE?
8	А.	In addition to non-substantive editorial changes, the Company is proposing the following
9		changes to its existing HEART eligibility requirements:
10		• Make customers living at the account premise, but without service in their name,
11		eligible to participate in the HEART program;
12		• Amend the requirement for participants to direct their LIHEAP payments to
13		Kentucky Power only applicable to those customers who heat primarily with
14		electricity;
15		• Remove the requirement to apply for available weatherization programs and
16		accept services if eligible and available;
17		• Remove the requirement to provide Kentucky Power with access for monthly
18		meter readings; and
19		• Delete the requirement for participants to enroll in Kentucky Power's Average
20		Monthly Payment ("AMP") plan.
21	Q.	WHY IS KENTUCKY POWER PROPOSING TO MODIFY ITS EXISTING
22		REQUIREMENT THAT A HEART APPLICANT BE A RESIDENTIAL

1		CUSTOMER OF KENTUCKY POWER WITH SERVICE IN THE APPLICANT'S
2		NAME OR HAVE APPLIED FOR SERVICE IN THE APPLICANT'S NAME?
3	A.	The change is being made for two reasons. First, the modification better aligns the
4		program's requirements with the federal LIHEAP program's goals. Second, by
5		expanding the means by which the applicant can demonstrate that the HEART credits
6		will accrue to the benefit of the applicant, the change better meets the program's goal of
7		providing assistance to income-eligible households without regard to the name on the
8		account.
9	Q.	IN PROPOSING THIS CHANGE, WAS THERE A CONCERN THAT A SINGLE
10		ACCOUNT OR SERVICE ADDRESS WOULD RECEIVE MULTIPLE HEART
11		BENEFITS IN A SINGLE PROGRAM YEAR?
12	A.	Yes. Kentucky Power considered this possibility and is proposing a revision to the
13		contract that makes clear each account or service address will be eligible for only one
14		HEART benefit during a single Program Year.
15	Q.	WHY IS KENTUCKY POWER PROPOSING THAT CUSTOMERS WHOSE
16		PRIMARY SOURCE OF HEAT IS NOT ELECTRICITY NO LONGER BE
17		REQUIRED TO DIRECT LIHEAP PAYMENTS TO THE COMPANY?
18	A.	LIHEAP primarily is intended to assist low-income households in meeting their winter
19		heating needs. Allowing customers who use natural gas, for example, as the primary
20		source of heat to direct their LIHEAP benefits to their natural gas supplier is more
21		consistent with the purpose of the LIHEAP program than requiring that the LIHEAP
22		benefits be used to pay the customers' electric bill.
23	Q.	WHY IS KENTUCKY POWER PROPOSING TO REMOVE THE

REQUIREMENT THAT APPLICANTS APPLY FOR WEATHERIZATION PROGRAMS AND ACCEPT ANY AVAILABLE SUCH SERVICES IF ELIGIBLE?

4	A.	Requiring that applicants apply for weatherization service has proved not only inefficient,
5		but also interfered with the operation of weatherization programs. Experience has
6		demonstrated that many HEART applicants ultimately are found not to be eligible for
7		weatherization services. In such instances, the requirement was an unnecessary hurdle to
8		applicants receiving HEART benefits. The requirement that HEART applicants apply for
9		weatherization program services also increased the number of weatherization applications
10		to be reviewed by the CAAs, which added to the waiting list for weatherization programs.
11		This increase in the number of applicants in turn:
12		a) Increased the wait time for those customers who were seeking weatherization aid
13		outside of HEART;
14		b) Created customer frustration for those who applied for weatherization through
15		HEART, but were deemed ineligible; and
16		c) Placed additional administrative burden on the CAAs during one of their busiest
17		times.
18	Q.	WHY IS THE COMPANY PROPOSING TO REMOVE THE REQUIREMENT
19		THAT HEART APPLICANTS ALLOW KENTUCKY POWER ACCESS TO
20		METER READINGS?
21	A.	The requirement is unnecessary. The Company's Terms and Conditions of Service
22		already require that such access be provided.
23	Q.	WHY IS THE COMPANY PROPOSING TO DELETE THE REQUIREMENT

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THAT APPLICANTS ENROLL IN AMP?

A. The requirement that participants enroll in AMP was a new addition for the 2019
program year. A customer enrolled in AMP pays his or her trailing twelve-month average
bill amount each month. In the twelfth month, any balance or credit that has accumulated
is spread in equal amounts over the customer's next twelve bills. AMP helps customers
better manage their electric bills by spreading the highest bills over a twelve-month
period. In particular, it shaves the peak off the highest bills, making them more affordable
and predictable.

9 The intent of requiring HEART recipients to enroll in AMP was two-fold: a) to 10 provide a tool for customers to better manage bills; and b) to enable customers to 11 transition off HEART and thereby allow the program to provide assistance to other 12 customers.

13 The CAAs reported that many otherwise eligible customers elected not to enroll 14 in the HEART program due this new requirement. It is Kentucky Power's understanding 15 these HEART applicants indicated they were uncomfortable with the requirement and 16 chose not to proceed.

Additionally, according to the CAAs, a high percentage of HEART applicants are on a fixed income. As such, AMP is unlikely to help transition these customers from the HEART program. The funds available to many fixed income customers to pay their electricity bill remain constant throughout the year and a bill management tool such as AMP many times is insufficient to address the underlying issue. Yet, many of these customers will benefit from continued support through the HEART program. The Company wants to ensure that the HEART and THAW programs are a positive experience for customers. While the AMP program is and can be a real benefit
 for many of Kentucky Power's customers, making it a requirement for participation in the
 HEART program was counterproductive.

4 Q. IS THERE A WAY THAT HEART APPLICANTS WHO MIGHT BENEFIT 5 FROM PARTICIPATION IN AMP AND OTHER COMPANY PAYMENT PLANS 6 CAN OBTAIN INFORMATION REGARDING THE PLANS IN THE COURSE 7 OF APPLYING?

8 A. Yes. In lieu of requiring customers to enroll in AMP, information regarding the
9 Company's available payment plans will be communicated via CAA agents and an
10 informational leaflet. For an example of this leaflet, please see Exhibit BKW-1.

11 As is otherwise the case for all Kentucky Power customers, the decision to 12 participate in a payment plan will be solely at the customer's discretion. The Company's 13 proposed change places the onus on the Company, CAK, and CAAs to provide and 14 distribute pertinent information and to make HEART applicants aware of available 15 payment plans. Importantly, this provides HEART applicants with the ability to meet 16 with a CAA agent who can guide the customer through the various options, the benefits 17 that each payment plan offers, and an explanation of what to expect should the customer 18 choose to enroll.

B. Modifications to THAW Eligibility Requirements

19Q.WHAT ARE THE CHANGES BEING PROPOSED TO THE THAW20ELIGIBILITY REQUIREMENTS?

A. The Company is proposing the following changes to its existing THAW eligibility
requirements:

1		• Enable customers living at the account premise, but without service in their name,
2		eligible to enroll in THAW;
3		• Delete the requirement that an applicant not have a Kentucky Power account that
4		is more than 59 days past due in connection with any residential account at the
5		time of application;
6		• Delete the requirement that applicants not have engaged in fraudulent activity or
7		presented the Company on one or more occasions with dishonored checks or
8		electronic transfer for payment; and
9		• Provide information to THAW applicants regarding the Company's payment plan
10		options.
11	Q.	WHY IS KENTUCKY POWER PROPOSING TO MODIFY THE
12		REQUIREMENT THAT A THAW APPLICANT BE A RESIDENTIAL
13		CUSTOMER OF KENTUCKY POWER WITH SERVICE IN THE APPLICANT'S
14		NAME OR HAVE APPLIED FOR SERVICE IN THE APPLICANT'S NAME?
15	A.	The proposal, which tracks the change proposed for the HEART program, is being made
16		for the same reasons the HEART program requirement is being amended.
17	Q.	WHY IS THE COMPANY SEEKING TO REMOVE THE REQUIREMENT
18		THAT CUSTOMERS BE NO MORE THAN 59 DAYS PAST DUE IN
19		CONNECTION WITH ANY RESIDENTIAL ACCOUNT AT THE TIME OF A
20		THAW APPLICATION?
21	А.	The requirement unintentionally conflicts with the federal LIHEAP Crisis program,
22		which begins in early January.
23		The LIHEAP Crisis program makes assistance available to applicants who are

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1		"within 4 days of running out of wood, coal, propane, fuel oil, or kerosene" or "have
2		received a disconnect/past due notice from the vendor." The CAAs reported that THAW
3		benefits can supplement LIHEAP Crisis funds and bridge the gap between the total
4		amount required to eliminate the threat of disconnection (as required by the LIHEAP
5		Crisis program) and the amount of the LIHEAP crisis funds available to the applicant.
6		The current THAW requirement that participants be no more than 59 days in arrears had
7		the unintentional effect of denying THAW funds to those applicants who could use them
8		to "bridge the gap." Kentucky Power, CAK, and the CAAs, identified this requirement as
9		one that should be eliminated.
10	Q.	WHY IS KENTUCKY POWER PROPOSING TO DELETE THE
11		
11		REQUIREMENT THAT APPLICANTS NOT HAVE ENGAGED IN
11		REQUIREMENT THAT APPLICANTS NOT HAVE ENGAGED IN FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR
12	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR
12 13	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR ELECTRONIC TRANSFERS FOR PAYMENTS TO KENTUCKY POWER?
12 13 14	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR ELECTRONIC TRANSFERS FOR PAYMENTS TO KENTUCKY POWER? The proposal will facilitate the processing of applications. Under the current
12 13 14 15	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR ELECTRONIC TRANSFERS FOR PAYMENTS TO KENTUCKY POWER? The proposal will facilitate the processing of applications. Under the current requirement, a Kentucky Power employee is required to manually verify the absence of
12 13 14 15 16	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR ELECTRONIC TRANSFERS FOR PAYMENTS TO KENTUCKY POWER? The proposal will facilitate the processing of applications. Under the current requirement, a Kentucky Power employee is required to manually verify the absence of fraudulent activity or dishonored checks or electronic payments. The process not only
12 13 14 15 16 17	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR ELECTRONIC TRANSFERS FOR PAYMENTS TO KENTUCKY POWER? The proposal will facilitate the processing of applications. Under the current requirement, a Kentucky Power employee is required to manually verify the absence of fraudulent activity or dishonored checks or electronic payments. The process not only can be time consuming, and thereby slowing the application acceptance process, but also
12 13 14 15 16 17 18	A.	FRAUDULENT ACTIVITY OR PRESENTED DISHONORED CHECKS OR ELECTRONIC TRANSFERS FOR PAYMENTS TO KENTUCKY POWER? The proposal will facilitate the processing of applications. Under the current requirement, a Kentucky Power employee is required to manually verify the absence of fraudulent activity or dishonored checks or electronic payments. The process not only can be time consuming, and thereby slowing the application acceptance process, but also diverts employee resources from other tasks. An applicant would be eligible for THAW

1	Q.	WHY IS KENTUCKY POWER PROPOSING THAT THAW APPLICANTS BE
2		PROVIDED WITH INFORMATION REGARDING THE COMPANY'S
3		PAYMENT PLANS?
4	А.	This change mirrors the change to the HEART program and is made for the same
5		reasons.
		C. Modifications to General Program Administration
6	Q.	IS THE COMPANY PROPOSING ANY CHANGES TO CAK'S
7		ADMINISTRATION OF THE HEART AND THAW PROGRAMS?
8	A.	Yes. The Company is proposing to provide CAK flexibility to redistribute THAW funds
9		between local CAAs. Such flexibility is required to ensure administrative formalities do
10		not unduly prevent customers from receiving help, and that flexibility currently exists for
11		the HEART program. This change will further harmonize the administration of the
12		HEART and THAW programs, while helping the greatest number of customers in a
13		program year.
14		The calculation of funds and slots for the programs performed by Kentucky
15		Power is designed to ensure fair distribution of residential energy assistance funding
16		within the Company's service territory. Under the Company's proposal, CAK can shift
17		unused funds from one community action agency to other community action agencies
18		experiencing unmet needs. This is particularly important in connection with the THAW
19		program, which is intended to assist applicants with temporary hardships. The extent and
20		location of such temporary needs can be unpredictable, and it is important for CAK to
21		have flexibility to address temporary customer needs when and where they occur.
22		When funds or slots are redistributed, CAK will notify Kentucky Power within

1		three business days. This will ensure that the Company remains aware of THAW
2		program activities and will be able to address any concerns that should arise from such
3		redistributions.
		V. <u>ADMINISTERING AND FUNDING THE PROGRAMS</u>
		A. <u>Program Administration</u> .
4	Q.	IS THE COMPANY PROPOSING ANY OTHER CHANGES TO PROGRAM
5		ADMINISTRATION?
6	A.	No. The funding and administration of both programs would remain as currently
7		approved.
8	Q.	IS THERE A NEW AGREEMENT GOVERNING THE PROGRAMS?
9	A.	Yes. The amended agreement reflects the proposed program changes described above.
10		The amended agreement is attached as EXHIBIT 2 AND EXHIBIT 3 to the application and
11		will become effective upon Commission approval of the Company's Application in this
12		proceeding.
		B. <u>Tariff Changes</u> .
13	Q.	ARE CHANGES TO KENTUCKY POWER'S TARIFFS REQUIRED TO
14		IMPLEMENT THE COMPANY'S PROPOSALS?
15	A.	No.
		VI. <u>TIME FRAME FOR A DECISION</u>
16	Q.	IS KENTUCKY POWER REQUESTING AN ORDER BY A CERTAIN DATE IN
17		THIS PROCEEDING?
18	A.	Yes. To provide CAK the information required to administer the programs in 2020 and
19		to notify customers of the changes, as well as the time required to train staff and for the

- 1 local CAAs to receive and process applications, the Company requests a decision by
- 2 September 15, 2019.

3 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

4 A. Yes.

WE CAN HELP YOU TAKE CONTROL OF YOUR BILLS

Kentucky Power customer service representatives are ready to help you and can be reached at 1-800-572-1113.

RECEIVE AN UNEXPECTED BILL THIS MONTH?

If you have medical issues, call us and we'll explain how to get a medical extension.

Learn about our Payment Assistance programs including our programs to provide assistance to low-income customers.

We offer various payment plans to help manage bills:

Set up an Extended Payment Agreement to divide a larger bill into installments and pay over several months.

Enroll in the Average Monthly Payment (AMP) plan, which allows for a rolling 12-month average bill to even out winter heating and summer cooling bill spikes. Your monthly AMP is determined by averaging the actual amount of your current bill plus your 11 previous monthly bills. Every month, the oldest of the 11 previous bills is removed from the calculation, and your new current bill is included. This is why the AMP amount will vary slightly from month to month. However, these fluctuations should be less than the variations you would see paying your actual bill each month.

Enroll in Budget billing to even out winter heating and summer cooling bills. Budget billing allows you to pay a set bill amount each month based on the 12-month average. This amount is reviewed throughout the year and can be adjusted if needed. At the end of 12 months you settle up the account by either paying any remaining balance due or receiving a credit balance. Budget billing can only be established April through December.

To sign up for any of these programs, log into your account on our website, or by calling us at 1-800-572-1113.

WANT TO REDUCE ELECTRICITY USAGE?

Learn energy saving tips by visiting kentuckypower.com/save

Call our partner, Community Action of Kentucky, at 1-800-456-3452 to learn about our home weatherization program for lowincome families. Energy audits, consultation, and extensive weatherization and energy conservation measures will be provided to eligible low-income customers. Low-income customers who use an average of 700 kWh per month are eligible for the program. Our partner, Christian Appalachian Project, also can assist low-income seniors in Floyd, Johnson, Knott and Martin counties. Call 1-866-270-4227 for assistance.

SIGN UP FOR BILLING ALERTS.

If you received a disconnect notice because you forgot to make a payment, consider being alerted when bills are due. You can sign up to have the payment automatically withdrawn from your bank account.

Help a family member or friend avoid a service disconnection in the future with the Third-Party Notification Program. The account holder can sign you up to receive copies of the billings if service is at risk for nonpayment. Go to kentuckypower.com/account/bills/assistance or call us at 1-800-562-1113.

VERIFICATION

The undersigned, Brian K. West, being duly sworn, deposes and says he is the Director of Regulatory Services for Kentucky Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief

Brian K. West

Commonwealth of Kentucky County of Boyd

Case No. 2019-00245

Subscribed and sworn before me, a Notary Public, by Brian K. West this ______ day of August, 2019.

_____ rox Blun Notary Public

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My Commission Expires 8/24/20