

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC 2019 INTEGRATED)
RESOURCE PLANNING REPORT OF) Case No. 2019-00443
KENTUCKY POWER COMPANY)

**SOUTHERN RENEWABLE ENERGY ASSOCIATION’S
MOTION TO INTERVENE**

Pursuant to 807 KAR 5:001, Section 4(11), the Southern Renewable Energy Association (“SREA”) requests that it be granted full intervenor status in the above-captioned proceeding(s).

1. On December 11, 2019, Kentucky Power Company (“KPC” or “Company”) filed its Notice of Intent to File an Application for 2019 Integrated Resource Planning Report Using Electronic Filing Procedures. On December 20, 2019, KPC filed with the Commission its 2019 Integrated Resource Plan (IRP). On February 14, 2020, the Kentucky Public Service Commission (“PSC” or “Commission”) set the procedural schedule for this case, including an intervention deadline of April 3, 2020. As such, SREA’s motion to intervene is timely.

2. SREA has a special interest in this case. Established in 2013, SREA is an industry-led initiative that promotes responsible use and development of wind energy, solar energy, energy storage and transmission solutions in the South. Our vision is for renewable energy to become a leading source of energy in the South and our mission is to promote responsible use and development of renewable energy in the South, including Kentucky.
 - a. IRP's are used by electric utilities to determine energy and resource capacity needs into the future. Utilities rely on IRP's to plan resource procurement, including procurement of renewable energy projects.
 - b. SREA's members are actively developing renewable energy projects in Kentucky. Nearly 2,000 megawatts of renewable energy resources and batteries are currently listed in the PJM Planning Queue for Kentucky.¹ In the MISO interconnection queue, nearly 800 megawatts of renewable energy resources and batteries are listed for Kentucky.²
 - c. As a nonprofit trade association, SREA and its representative fulfill the definition of "person" under KRS 278.010(2) as "...two (2) or more persons having a joint or common interest..." Our joint common interest is to enable this docket to accurately and adequately evaluate renewable energy resources for potential procurement by the Company. In accordance with 807 KAR 5:001 Section 4(4), SREA is not submitting "...a paper on behalf of another person, or otherwise represent another person..." SREA is representing itself.
3. SREA's intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter. SREA has filed comments in several

¹ <https://www.pjm.com/planning/services-requests/interconnection-queues.aspx>

² https://www.misoenergy.org/planning/generator-interconnection/GI_Queue/

Kentucky utility IRP's including Big Rivers (2018), Kentucky Power (2017), and Louisville Gas & Electric and Kentucky Utilities (2020). SREA has successfully participated in IRP's in Arkansas, Georgia, Louisiana, and with the Tennessee Valley Authority. SREA's involvement with the IRP processes in both Arkansas and Louisiana with the Southwestern Electric Power Company ("SWEPCO"), another AEP subsidiary like Kentucky Power, would be particularly insightful for the Commission, staff, and other parties to this case. SREA was the lead author in the Arkansas PSC Stakeholder Report for the SWEPCO IRP. There, AEP staff wrote that, "The Company would like to thank all of the Stakeholders for both participating in the Stakeholder ...and for developing very constructive comments and feedback on the Company's DRAFT IRP."³ SREA anticipates a similar positive, and collaborative effort in this IRP. As such, SREA's intervention would occur without unduly complicating or disrupting the proceedings

4. SREA is not otherwise adequately represented in this case. No other intervening party reflects the interests of supply-side energy resources, namely, large-scale renewable energy development companies.
5. SREA does not request service by physical United States Postal Service mail. SREA certifies that it, or its agent, possesses the facilities to receive electronic transmissions.

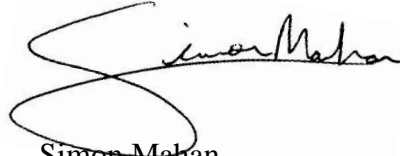
Service of all documents may be directed to:

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³ http://www.apscservices.info/pdf/07/07-011-U_32_2.pdf

WHEREFORE, SREA requests that it be granted full intervenor status in the above-captioned proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Simon Mahan", written over a light gray rectangular background.

Simon Mahan
Executive Director
Southern Renewable Energy Association
PO Box 14858
Haltom City, TX 76117
simon@southernwind.org

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of the foregoing is a true and accurate copy of the document(s) being filed in paper medium; that the electronic filing was transmitted to the Commission on April 3, 2020 that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



Simon Mahan
Executive Director
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