

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY POWER
COMPANY FOR: (1) APPROVAL TO EXPAND ITS)
TARGETED ENERGY EFFICIENCY PROGRAM; (2))
APPROVAL OF A HOME ENERGY IMPROVEMENT)
PROGRAM AND A COMMERCIAL ENERGY)
SOLUTIONS PROGRAM; (3) AUTHORITY TO)
RECOVER COSTS AND NET LOST REVENUES, AND) Case No. 2024-00115
TO RECEIVE INCENTIVES ASSOCIATED WITH THE)
IMPLEMENTATION OF ITS DEMAND-SIDE)
MANAGEMENT/ENERGY EFFICIENCY PROGRAMS;)
(4) APPROVAL OF REVISED TARIFF D.S.M.C.; (5))
ACCEPTANCE OF ITS ANNUAL DSM STATUS)
REPORT; AND (6) ALL OTHER REQUIRED)
APPROVALS AND RELIEF

**MOTION OF JOINT INTERVENORS MOUNTAIN ASSOCIATION,
APPALACHIAN CITIZENS' LAW CENTER, KENTUCKIANS FOR THE
COMMONWEALTH, AND KENTUCKY SOLAR ENERGY SOCIETY TO AMEND
PROCEDURAL SCHEDULE**

Come now Mountain Association, Appalachian Citizens' Law Center,
Kentuckians for the Commonwealth, and Kentucky Solar Energy Society (collectively
"Joint Intervenors") and respectfully move the Kentucky Public Service Commission
to amend its May 30, 2024 Order establishing a procedural schedule in this case to
establish deadlines for intervenor testimony. In support of their motion, Joint
Intervenors state the following:

1. Joint Intervenors move to amend the procedural schedule pursuant to the Commission’s May 30, 2024 Order, which states “The procedural schedule may be amended to accommodate any intervenor testimony.”

2. Joint Intervenors propose an amended schedule establishing deadlines for intervenor testimony, additional data requests, and rebuttal testimony as follows:

Intervenor testimony, if any, in verified prepared form shall be filed no later than	8/21/24
All requests for information to Intervenors shall be filed no later than	8/30/24
Intervenors shall file responses to requests for information no later than	9/11/24
Kentucky Power rebuttal testimony shall be filed no later than	9/18/24
Last day for Parties to request a Public Hearing or submit a request for the matter be decided based upon the written record	9/20/24

3. Joint Intervenors request the procedural schedule be amended as set forth above to ensure that they will have an opportunity to file expert testimony in this case. The proposed schedule will allow adequate time for Joint Intervenors to develop expert witness testimony, which Joint Intervenors respectfully submit will assist the Commission in its review of the issues in this case. The dates suggested above also allow time for review and rebuttal by other parties. Amending the

schedule to establish the deadlines now would assist all parties in planning for these deadlines.

4. Counsel for Kentucky Power Company has represented that Kentucky Power Company does not object to the revised schedule.

WHEREFORE, for the reasons stated above, Joint Intervenors respectfully request the procedural schedule be amended to include deadlines for the filing of intervenor testimony, additional data requests, and rebuttal testimony.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Byron Gary", written over a horizontal line.

Byron Gary
Ashley Wilmes
Thomas J. FitzGerald
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602 (502) 509-2183
Byron@kyrc.org
Ashley@kyrc.org
FitzKRC@aol.com

Counsel for Joint Intervenors, Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society

CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, this is to certify that the electronic filing was submitted to the Commission on June 21, 2024; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron Gary