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BEFORE THE PUBLIC SERVICE COMMISSION

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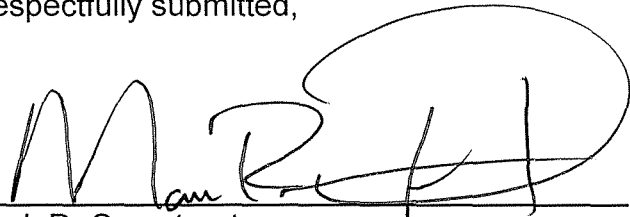
In the Matter of:

TWO-YEAR REVIEW OF KENTUCKY)
POWER COMPANY'S HOME ENERGY) CASE NO. 2009-00117
ASSISTANCE PROGRAM)

Notice of Filing

Pursuant to the Commission's December 14, 2006 Order in Case No. 2006-00373, and the Commission's March 25, 2009 Order in this proceeding, Kentucky Power Company and Kentucky Association for Community Action, Inc. file an assessment and evaluation of Kentucky Power Company's home energy assistance program.

Respectfully submitted,



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COUNSEL FOR KENTUCKY POWER
COMPANY

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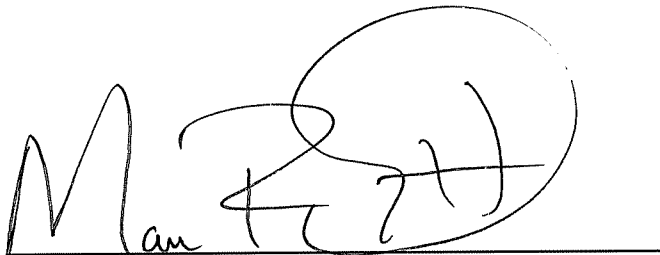
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by first class mail, postage prepaid, upon the following parties of record, this 31st day of March, 2009.

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COMMISSION

**Kentucky Power Company
Home Energy Assistance Program**

Evaluation
for the
2006/2007 and 2007/2008
Program Years

March 2009

Prepared by:
Community Action Kentucky

And filed jointly with:

Kentucky Power (American Electric Power)

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Executive Summary:

- The program did a good job of helping participants who remained enrolled. The participants that withdrew from the program saw their arrearages increase, participated in the LIHEAP crisis component more frequently, had a much higher rate of disconnection, and received more cut off notices than those people who stayed in the program.
- The participants who stayed in the program had lower arrearages than those who withdrew, saw their arrearages decrease as well as their participation in the LIHEAP Crisis component.
- The late starting date of the program affected the ability to fully enroll the program for the first year. It was a program that was designed to enroll households in October and November and apply benefits for the winter heating months of December, January, February, March, as well as the summer cooling months of July, August, and September. The program was approved on Dec. 16th and then it took a couple of months to get the households enrolled. Most participant in the first year did not receive a benefit until July, so the data from the 2007-2008 program year yields the most complete picture.
- The number of participating households receiving disconnect notices began to fall in the first full year of the program in 07/08.
- The percentage of households receiving service disconnects for program participants in 06/07 was reduced by over 25% for program participants in 07/08.

Program Creation:

In October 2005 Kentucky Power filed for a rate increase that would increase its electric rates that would affect residential customers. Community Action Kentucky intervened in the rate case along with Kentucky Industrial Utility Customers (KIUC), and the Attorney General's Office. As part of the settlement of that case, it was agreed that a home energy assistance program for residential low income customers would be created and funded by a 10 cent per meter per month charge. This was expected to generate approximately \$175,000 per year. In addition, the company agreed to contribute \$175,000 per year for the first two years of the program for a total of \$350,000 per year for the first two years. Kentucky Power was a leader in contributing shareholder dollars to support the first two years of the program.

The program was very necessary given the fact that the poverty rate was higher in Kentucky Power's service territory than in the rest of the state. According to the US Census Bureau data from December 2008 Kentucky already has one of the higher poverty rates in the nation at 17.2%. This is 25% above the national average of 13%. In the Kentucky Power service territory counties the median poverty rate is 27.2%, which is nearly 60% higher than the state rate and more than 100% higher than the national rate.

Program startup:

The HEA program was designed to start in November of each year and run through October of the following year, benefits being distributed during the billing cycles for the winter heating months of December, January, February and March, then the Summer cooling cycles of July, August and September.

Approval for the program came from the Kentucky Public Service Commission on December 14, 2006 and the initial startup of the program began in December 2006. Participants in the Subsidy component of the Low Income Home Energy Assistance Program (LIHEAP) were electronically screened based upon their vendor usage (in this case Kentucky Power / American Electric Power) and then auto created applications. Agencies reviewed those applications and submitted to AEP to retrieve History data to build application priority. Based upon application priority, applicants were then enrolled into the program. The use of the auto-enrollment was necessary for speed of start up and it reduced the length of time required for the applicants to receive their first program benefits. However, although there is a points system in place, it reduced the ability for the staff at the Community Action Agencies to locate and enroll households who may have obtained the greatest benefit from the program- those who may have had the opportunity to leverage the benefit of multiple programs and thereby reduce their arrearages, cutoff notices or need for LIHEAP crisis. Additionally, applicants were not actually enrolled in the program until early 2007, and therefore were not able to receive the full benefits the first year. Therefore, the effects of the program are best measured by a closer examination of the 2007-2008 year because participants were better able to utilize a full year worth of benefits.

This delay, accompanied with participant withdrawal and other factors meant that the full dollar amount allocated for the first year was not completely consumed and resulted in a surplus of funding in the first year of program operation. These surplus benefits were applied to the second year in the form of additional available slots.

Program Expenditures and Distributions

At the end of the 06/07 Program Year \$119,329 had been distributed to the participating households. This is in contrast to the \$473,857.00 that was distributed during the 07/08 program year. The increased amount is due to the higher participation rate, and the distribution of funds during the 07/08 winter heating months that did not occur during the 06/07 winter heating months.

2006/2007 Expenditures and Distributions

MONTH	RESIDENTIAL HEAP BILLED	KENTUCKY POWER - MATCHING COMPONENT	SUBSIDIES DISTRIBUTED	CAK ADMINISTRATIVE COSTS	MONTHLY NET TOTALS
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Kentucky Power Company / Community Action Kentucky
Home Energy Assistance Program Evaluation

April-06	\$7,210.40	\$7,210.40	\$0.00	\$0.00	\$14,420.80
May-06	\$14,440.39	\$14,440.39	\$0.00	(\$2,900.00)	\$25,980.78
June-06	\$14,417.73	\$14,417.73	\$0.00	(\$2,900.00)	\$25,935.46
July-06	\$14,419.43	\$14,419.43	\$0.00	\$0.00	\$28,838.86
August-06	\$14,399.95	\$14,399.95	\$0.00	\$0.00	\$28,799.90
September-06	\$14,430.91	\$14,430.91	\$0.00	\$0.00	\$28,861.82
October-06	\$14,428.36	\$14,428.36	\$0.00	\$0.00	\$28,856.72
November-06	\$14,441.02	\$14,441.02	\$0.00	\$0.00	\$28,882.04
December-06	\$14,463.47	\$14,463.47	\$0.00	\$0.00	\$28,926.94
January-07	\$14,504.03	\$14,504.03	\$0.00	\$0.00	\$29,008.06
February-07	\$14,487.04	\$14,487.04	\$0.00	\$0.00	\$28,974.08
March-07	\$14,486.67	\$14,486.67	(\$10,609.00)	\$0.00	\$18,364.34
April-07	\$14,455.34	\$14,455.34	\$1,530.00	\$0.00	\$30,440.68
May-07	\$14,413.38	\$14,413.38	\$0.00	\$0.00	\$28,826.76
June-07	\$14,404.15	\$14,404.15	(\$4,987.00)	\$0.00	\$23,821.30
July-07	\$14,381.77	\$14,381.77	(\$36,967.00)	\$0.00	(\$8,203.46)
August-07	\$14,402.29	\$14,402.29	(\$36,804.00)	\$0.00	(\$7,999.42)
September-07	\$14,427.61	\$14,427.61	(\$31,492.00)	\$0.00	(\$2,636.78)
October-07	\$14,416.48	\$14,416.48	\$0.00	(\$9,900.00)	\$18,932.96

(\$119,329.00)

2007/2008 Expenditures and Distributions

MONTH	RESIDENTIAL HEAP BILLED	KENTUCKY POWER - MATCHING COMPONENT	SUBSIDIES DISTRIBUTED	CAK ADMINISTRATIVE COSTS	MONTHLY NET TOTALS
November-07	\$14,434.98	\$14,434.98	(\$196.00)	\$0.00	\$28,673.96
December-07	\$14,457.91	\$14,457.91	(\$72,479.00)	(\$43,562.00)	(\$87,125.18)
January-08	\$14,505.59	\$14,505.59	(\$81,020.00)	\$0.00	(\$52,008.82)
February-08	\$14,465.73	\$14,465.73	(\$82,683.00)	\$0.00	(\$53,751.54)
March-08	\$14,471.95	\$14,471.95	(\$82,686.00)	\$0.00	(\$53,742.10)
April-08	\$14,449.48	\$0.00	\$0.00	\$0.00	\$14,449.48
May-08	\$14,408.46	\$0.00	\$0.00	\$0.00	\$14,408.46
June-08	\$14,399.49	\$0.00	\$0.00	\$0.00	\$14,399.49
July-08	\$14,409.39	\$0.00	(\$78,031.00)	(\$6,169.00)	(\$69,790.61)
August-08	\$14,404.40	\$0.00	(\$76,762.00)	\$0.00	(\$62,357.60)
September-08	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
October-08	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

(\$473,857.00)

Evaluation Data

Several Data Sources were used in the development of this report. :

1: American Electric Power provided data relevant to:

- The number of cutoff notices per account number
- The number of disconnect notices per account number
- The arrearages per account number
- HEA enrollment data per account
- Program slot usage
- Benefits provided
- Budget and financial Data
- Data from other relevant programs

2: Community Action Kentucky was a source for:

- Client intake and demographics
- LIHEAP data
- Income data
- Weatherization data
- Budget and Financial Data

Program Enrollment

Applicants are enrolled into the Program by the CAA's. During LIHEAP Subsidy, the applicant's information is updated and recorded, and a Vendor Program application is completed in the CAK CASTiNET software system. Within 24 hours the software system sends request file to AEP for a 12 month usage history. When the history file is returned, the system will generate a point ranking for the application. This point scale will be used as the basis for the priority system of enrollment to fill the slot allocations. Once all slots are filled, the remaining applications are placed in priority order on a waitlist, were they remain until a slot becomes available should an enrollee become rejected or un-enrolled.

The point calculation works as in a way similar to the point system used for determining need in weatherization.

Demographic Point Calculation
Number of Disabled in household __ X 5 = points
Number of Children under 6 years of age __ X 5 = points
Single Elderly and/or single disabled __ X 5 = points
Total Family members __ X 1 = points

Income Point Calculation
100-150% of Poverty Level = 1 Point
75%-99% of Poverty Level = 2 Points
<75% of Poverty = 3 Points

Primary Fuel Type Points
Electric = 8 Points
Propane = 6 Points
Oil = 4 Points
Gas = 3 Points
Coal = 2 Points
Wood = 4 Points

Fuel Cost Points

Annualize the last 12 months of kWhs and multiply by the price per kWh. This is divided by the annual income and a lookup on the following table is performed. The 06/07 program year was calculated at .063 per kWh and the 07/08 was calculated at .0673 per kWh.

Percent of Poverty Calculation
0-5% - 2 points
6-14% - 4 points
15-21% - 6 points
22-28% - 8 points
29-33% - 10 points
>34% - 15 points
Zero Income – 15 Points

All points from the above categories are totaled to create the priority points assigned to an application.

Waitlist

Applicants who are not immediately selected for enrollment are placed on a waitlist. These applications are applied to open slots based upon their priority points. CAA’s typically enroll more applicants than the number of available slots so that there are applicants available on the waitlist.

Program Enrollment Slots

Program Slots allocated for the 2006/2007 Year

Agency	Enrolled slots	
	Electric	Base Load
Big Sandy	178	22
Gateway	6	2
LKLP	112	33
Middle KY	17	15
Northeast	106	57
	419	129
Total		548

Agency	Enrolled Slots	
	Electric	Base Load
Northeast	257	148
Middle KY	38	37
Gateway	16	5
LKLP	273	85
Big Sandy	402	109
	986	384
Total		1370

Impact on Arrearages

For households participating and remaining in the program overall arrearages for the group decreased six percent as the average arrearage per household decreased from \$410 to \$390.05

This compares to the households that withdrew from the program whose average arrearages increased by over 25%, going from an average of \$612.10 to \$765.75

Comparing arrearages of participants who stayed in program versus those who left

	Increase/decrease of arrearages	Average Begin	Average End
Enrolled	6% reduction	\$410.00	\$390.05
Withdrew	25% increase	\$612.10	\$765.75

Summary :

Overall arrearages decrease for those households that stayed in the program saw their arrearages decrease by 6%, while those dropped from the program increased by 25%, saving significant dollars for the company and the rate payers by reducing the possibility of bad debt.

It should be noted that some HEA type programs place a cap on the amount of arrearages that a household can have prior to program entry. The HEA program operated by Louisville Gas and Electric for example requires that participants have no more than \$700 in arrearages to be eligible. The Kentucky Power Program has no such restriction, and allows participants to enter with significant arrearages already in place. It may be difficult for these individuals to pay down these arrearages, and should be considered if comparing the performance of the Kentucky Power HEA program against the performance of other programs.

Impact on Disconnect Notices:

The households that remained in the program saw a lower in

	Average number of disconnects Notices per 12 months
Enrolled	2.52
Withdrew	3.50

While the enrolled households did see a slight increase in their number of disconnects going from 2.39 per household per year to 2.52 per household per year, an increase of 6%, this is still much lower than the households that withdrew who saw their number of disconnects go from 2.80 to 3.50. The

households that with drew receive on average 40% more disconnect notices a year and saw their rate of receiving disconnect notices increase by 25%.

Summary:

The number of disconnect notices did slightly increase for households that remained in the program, but their outcomes were much better than households who withdrew from the program as those households saw their rate of disconnect notices increase by 25% as opposed to 6% for those who remained in the program. In addition enrolled households receive 40% fewer disconnect notices than those left the program.

Impact on Service Disconnects:

For the households that remained in the program, they saw a much lower disconnect rate than those remained enrolled in the program.

Improving	Disconnect rate
Enrolled	8.7%
Withdrew	30%

This shows that households who were able to remain in the program had a disconnect rate that was nearly 75% less than the households who left the program. The households that remained in the program did see a slight increase in their disconnect rate, going 8% to 8.7%, but it remained far lower than the households that left the program.

Impact on the LIHEAP Crisis Assistance

Because of the late start in the 06/07 year, program participants did not receive benefits until March 2006, after the LIHEAP crisis funds had been expended. This meant that the need for LIHEAP crisis in 2006 and 2007 was not impacted by participation in the 06/07 program year. The first LIHEAP crisis program where any measurable result would have been noted would have been the 2008 Crisis program year.

Impact on Participant households receiving LIHEAP Crisis

Of participants in the 06/07 program year, the data indicate a drop in the number of households that participated in LIHEAP crisis 2008 – the first measurable year after their enrollment. Data indicate that participants reduced LIHEAP Crisis participation rates from 33% and 44% in 2006

and 2007 to a rate of 23% in 2008. Those 06/07 participants moved from 56% without crisis in 2007 to 77% of households without crisis in 2008.

	CRISIS2006	CRISIS2007	CRISIS2008
Received Crisis	275	345	183
%	35%	44%	23%
Without Crisis	513	443	605
%	65%	56%	77%

Of participants in the 07/08 program year, the data indicate a drop in LIHEAP crisis participation as well. HEA participation rates in LIHEAP crisis fell from a rate of 40% in 2006 and 48% in 2007 down to a rate of 30% in 2008. In 2008, 70% of participating households were without LIHEAP crisis.

	CRISIS2006	CRISIS2007	CRISIS2008
Received Crisis	605	726	462
%	40%	48%	30%
Without Crisis	910	789	1053
%	60%	52%	70%

Impact on Number of LIHEAP Crisis Applications

For participants of the 06/07 program year, these applicants applied for and received LIHEAP Crisis assistance 384 times in the 2006 season, and 437 for the 2007 LIHEAP Crisis program year. However, during the 2008 LIHEAP crisis program year, Crisis applications for the 06/07 program participants fell to 202, a 53% reduction in the need for LIHEAP crisis.

06/07 Program Participants		
CRISIS 2006	CRISIS 2007	CRISIS 2008
384	437	202

As for participants in the 07/08 program year, it will be important to evaluate the need for LIHEAP crisis in the year following – ie 2009. At the time of this document preparation the 2009 LIHEAP crisis program is still ongoing it is not possible to evaluate the entire 2009 Crisis data set. However, the program participants did receive benefits as early as December 2007 and January 2008 through March 2008, and the data indicate that their use of LIHEAP crisis during this time fell by as much as 46%.

07/08 Program Participants		
CRISIS 2006	CRISIS 2007	CRISIS 2008
838	958	517

In both of these program years, it is important to note that participants may have sought LIHEAP Crisis benefits for fuel other than electricity. Although the HEA program would have only reduced the electricity fuel cost, the participant would have likely been in a better position to apply funds toward another fuel source instead- still reducing the need for crisis. Also, the 2008 LIHEAP Crisis participants were faced with unusually high increases in fuel costs among kerosene, propane, natural gas and other fuels.

Summary:

The data does indicate that participating households in both the 06/07 and 07/08 years reduced their use of LIHEAP Crisis in 2008. Because 06/07 participants did not receive benefits until after the 2007 LIHEAP Crisis program had there would be no expected benefit seen in the data for until the 2008 crisis year.

Movement of Participants into and out of Program

During the time period evaluated, more people joined the program than left the program. The single largest factor affecting the enrollment and disenrollment of participants has been the increase in number of slots. The surplus of funds and resulting increase in enrollment slots that were available after the 06/07 program year led to an increase of slot availability for the 07/08 year. Therefore actual enrollment increased from 548 in 06/07 to 1370 in 07/08.

In cases where applicants were enrolled for any amount of time and then left the program there is a direct impact seen in the data. Program participants who withdrew from the program were 20% more likely to participate in LIHEAP Crisis, with a rate of 36% for those who withdrew versus 30% for those remaining in the program.

Group	Service Type	Rate of LIHEAP Crisis
All	Baseload & Electric	30%
Withdrawn	Baseload & Electric	36%

Similar difference is seen in the data when looking at the All Electric participants. Those that withdrew from the program had a 24% higher rate of applying for LIHEAP Crisis, with a rate of 36% for those that withdrew and 29% for those that remained in the program.

Group	Service Type	Rate of LIHEAP Crisis
All	Electric	29%
Withdrawn	Electric	36%

In the case where an enrollment slot became open, it was often for one of the following reasons:

- Participant may move outside the service area
- No longer income eligible
- Participant may opt to leave the program
- Change in the status of the participant such as marriage, divorce, etc.

Impact of Weatherization

Of participants in the 06/07 and 07/07 years, there were identified 82 that had received weatherization services. Of those, only 31 had not been in time to have accumulated 12 months of usage data that would have allowed for an accurate analysis. The small incomplete data set, accompanied by the variability of factors such as weather variability over the short measurement period indicated that we should consider larger impact studies to evaluate the cost savings of weatherization. Because of these

factors, it is difficult to directly relate cost savings in a single 12 month period to the performance of the HEA program.

In June of 2007, RLW Analytics, Inc. of Clark Lake, Michigan developed a report for American Electric Power titled "Targeted Energy Efficiency Program 2006-2007 Load Impact Evaluation Report". In the report, it provides a detailed analysis of the cost savings estimates of weatherization programs for Kentucky Power Customers.

Based upon that report, the annual mean savings for the all-electric and non-all-electric participants were 2,032 kWh and 1,136 kWh respectively. Using the current rate of .06475, we expect that the average All Electric household will achieve an estimated annual savings of \$131.57 per year, and the non-all electric household will achieve an estimated annual savings of \$73.56 per year.

Type	kWh Annually	Rate	Household Annual Savings
All Electric	2032	0.06475	\$131.57
Non-All Electric	1136	0.06475	\$73.56

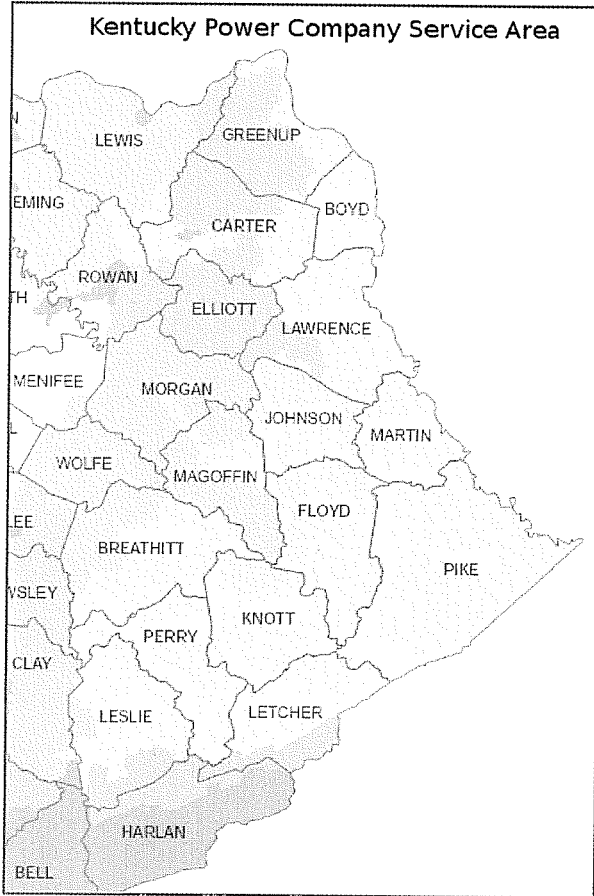
Recommendations

- Continue the program so that participants can continue to reduce improve their arrearages and reduce their service disconnects and need for LIHEAP crisis.
- Kentucky Power could improve the reporting system by sending the monthly distributions automatically via the secure electronic channel in place between CAK and Kentucky Power.
- Team program participants with CAA services such as budget counseling to assist with financial planning to reduce arrearages.
- Work with HEA participants to improve the weatherization participation rate to reduce energy consumption.

Appendix 1

Kentucky Power Service Area

American Electric Power operates the HEA program under Kentucky Power in the following Kentucky Counties:



- Boyd
- Breathitt
- Carter
- Elliot
- Floyd
- Greenup
- Johnson
- Knott
- Lawrence
- Leslie
- Letcher
- Magoffin
- Martin
- Morgan
- Owsley
- Perry
- Pike
- Rowan

(Map Image credit: KY Public Service Commission)

Poverty Rates in the Program Service Area

Source: U.S. Census Bureau, Small Area Estimates Branch
Release date: December 2008

Poverty by age-groups, children under 18:

Name	Poverty Estimate All Ages	Poverty Percent All Ages	Poverty Estimate Under Age 18	Name	Poverty Percent Under Age 18	Poverty Percent Ages 5-17
United States	38,052,247	13.0	13,097,100	United States	18.0	16.4
Kentucky	706,947	17.2	231,398	Kentucky	23.6	21.2
Kentucky Counties:						
Boyd County	7,627	16.4	2,358	Boyd County	23.6	21.6
Breathitt County	4,564	30.0	1,512	Breathitt County	45.3	42.0
Carter County	5,164	19.3	1,847	Carter County	29.1	28.0
Elliott County	1,932	27.4	576	Elliott County	37.9	33.5
Floyd County	13,487	32.9	4,062	Floyd County	44.4	41.2
Greenup County	5,571	15.2	1,757	Greenup County	22.5	20.8
Johnson County	5,780	24.4	1,737	Johnson County	32.8	30.5
Knott County	5,324	31.7	1,397	Knott County	39.5	33.2
Lawrence County	4,103	25.3	1,247	Lawrence County	34.6	30.8
Leslie County	3,608	31.0	937	Leslie County	37.4	35.4
Letcher County	6,408	27.0	1,781	Letcher County	35.3	34.5
Magoffin County	4,092	31.6	1,359	Magoffin County	43.7	40.9
Martin County	4,145	35.8	1,289	Martin County	45.5	41.7
Morgan County	3,351	27.1	1,021	Morgan County	36.8	32.4
Owsley County	2,002	44.4	552	Owsley County	55.0	54.5
Perry County	9,045	31.4	3,138	Perry County	47.2	42.1
Pike County	13,406	20.8	3,707	Pike County	26.6	24.9
Rowan County	4,774	24.5	1,223	Rowan County	28.7	24.5

Community Action Agencies Participating in Program

Northeast Kentucky Community Action Agency

539 Hitchins Avenue
Olive Hill, KY 41164
606/286-4443
Fax: 606/286-6733

Website www.nkcaa.net

COUNTY: BOYD

1844 Carter Avenue
Ashland, KY
606-324-8617

COUNTY: CARTER

539 Hitchins Avenue
Olive Hill, KY
606-286-4443

COUNTY: CARTER

603 West Main Street
Grayson, KY
606-474-8118

COUNTY: ELLIOTT

103 Gee Street
Sandy Hook, KY
606-738-6577

COUNTY: GREENUP

811 Seaton Avenue, Suite A
Greenup, KY
606-473-9873

COUNTY: LAWRENCE

180 Bulldog Lane
Louisa, KY
606-638-4067

Gateway Community Services Organization

124 College Street,
P.O. Box 367
West Liberty, KY 41472
606/743-3133
Fax: 606/743-1130

COUNTY: MORGAN
124 College St.
West Liberty, KY
606-743-3133

COUNTY: ROWAN
136 Lee Avenue Suite E
Morehead, KY
606-784-7735

Big Sandy Area Community Action Program

Johnson County Courthouse
230 Court Street
Paintsville, KY 41240
606/789-3641
Fax: 606/789-8344

COUNTY: FLOYD
193 East Court Street
Prestonburg, KY
606-886-2929

COUNTY: JOHNSON
Johnson Co. Court House
3rd Floor, Room 333
Paintsville, KY

606-789-6515

COUNTY: MAGOFFIN
131 South Church St.
Salyersville, KY
606-349-2217

COUNTY: MARTIN

Roy F. Collier Community Center
1200 Main Street
Inez, KY
606-298-3217

COUNTY: PIKE

478 Town Mt. Road
Pikeville, KY
606-432-2775

Middle Kentucky Community Action Partnership

1137 Main Street, Suite 106
Breathitt County Courthouse
Jackson, KY 41339
606/666-2452
Fax: 606/666-9780

Website: www.mkcap.org

COUNTY: BREATHITT

1137 Main Street, Suite 103
Jackson, KY
606-666-5902

COUNTY: OWSLEY

County Courthouse
Room 104, Main Street
Booneville, KY
606-593-5103

LKLP Community Action Council

398 Roy Campbell Drive
Hazard, KY 41701
606/435-7996
Fax: 606/487-1872

Website www.lklp.org

KNOTT
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