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**RECEIVED**

SEP 4 2014  
PUBLIC SERVICE  
COMMISSION

JACK B. BATES

IRIS G. SKIDMORE

**Via Hand-Delivery**

September 4, 2014

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

**Re: Case No. 2012-00428: Consideration of the Implementation of Smart Grid  
and Smart Meter Technologies**

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and fourteen copies of the Motion to Adopt Testimony on behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,

  
Iris G. Skidmore

Enclosure

RECEIVED

SEP 4 2014

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE  
COMMISSION

In the Matter of:

CONSIDERATION OF THE IMPLEMENTATION	)	
OF SMART GRID AND SMART METER	)	CASE NO.
TECHNOLOGIES	)	2012-00428

MOTION TO ADOPT TESTIMONY

\* \* \* \* \*

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and moves the Commission for an Order granting Malcolm J. Ratchford, Executive Director of CAC, permission to adopt the January 28, 2013 pre-filed written direct testimony of Charles D. Lanter in support of CAC's position in this matter. As grounds for this motion, CAC states that Charles D. Lanter is no longer employed by CAC, and Mr. Ratchford will adopt the testimony filed on behalf of CAC with corrections. This is necessary in the event the Commission has further questions for CAC in this matter. An Affidavit of Mr. Ratchford is attached.

Respectfully submitted,

IRIS G. SKIDMORE  
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COUNSEL FOR CAC

AFFIDAVIT OF MALCOLM RATCHFORD

Comes Malcolm J. Ratchford, and after being duly sworn, states as follows:

1. I am the Executive Director of the Community Action Council for Lexington Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. (CAC).
2. I have read the Direct Testimony filed in this case on behalf of CAC by Charles D. Lanter on January 28, 2013.
3. Charles D. Lanter, who was formerly the Manager for Program Development at CAC, is no longer employed by CAC, and has taken a position with Lexington-Fayette Urban County Government.
4. I affirm the questions and answers in the Direct Testimony are correct to the best of my information and belief, with minor corrections, and adopt the Direct Testimony of Mr. Lanter as my own with the following corrections:

On page 2 of the Testimony, lines 1-21, the following information regarding my current position and professional background should be substituted for Mr. Lanter's.

**My name is Malcolm J. Ratchford, and I have served as Executive Director at Community Action Council for one year and have worked in the Community Action Network for a total of 18 years. As Executive Director, I participate in and/or advise on all matters involving advocacy for affordable utilities, and I am informed on the research, analysis, program design, and support related to our advocacy in the affordable utilities cases before the Kentucky Public Service Commission. Additionally, I lead senior staff members on all matters concerning the Community Action Council, including our program design, resource development, strategic and organizational planning, marketing/outreach, and volunteer recruitment for the Council. I have a Bachelor's Degree in History Pre-Law from Talladega College, a Master's Degree in Family Studies, Early Childhood Education from the University of Kentucky and have received the national accreditation of Certified Community Action Professional.**

**Prior to my current position, I served as the Senior Manager for Neighborhood and Community Services. In that position I helped implement programs for the low-income populations of the areas we serve, and I am well-informed of the issues and concerns of the low-income populations for which we are advocating in this matter.**

On Page 7 of the Testimony, lines 1-2, the first full sentence should be substituted with the following, which is the current position of CAC as reflected in the June 30, 2014 Report of Joint Utilities:

Though CAC is open to the possibility of a fair and limited risk process for prepaid metering, it has previously opposed such processes and continues to be concerned. It is CAC's belief that prepaid metering will increase the number of customers facing disconnection and, therefore, the number and duration of families and children exposed to lack of heat in winter or cooling in summer. Recent extreme temperatures in 2014 serve to illustrate the risk. This is especially of concern for households where medical conditions such as asthma can be exacerbated by extreme temperatures. Any prepaid metering program should be very carefully examined and designed in close collaboration with community action agencies or other local providers who work regularly alongside customers with low-income. It should take into consideration households affected by a medical condition and or the homes of seniors and the disabled.

CAC is also concerned that the ability to remotely disconnect a customer could significantly increase the frequency of disconnections, especially among vulnerable populations such as customers with low-incomes and seniors or the disabled. Increased disconnections have been seen in markets where smart grid technology has been deployed. Although there may be some benefits such as a faster reconnect process, CAC is concerned that methods of rapid payment to facilitate such reconnection (internet access, credit cards for phone payment, etc.) are not universally available for the customers at risk of such a disconnection. This issue, because it poses a health threat to vulnerable customers left in extreme cold or heat by a remote or automated disconnection, is perhaps of the greatest concern to CAC of all smart grid issues. Further exploration of this issue is warranted to ensure consideration of special circumstances.

Further Affiant sayeth naught.

  
MALCOLM J. RATCHFORD

COMMONWEALTH OF KENTUCKY     )  
C   NTY OF FAYETTE

Subscribed to and sworn to before me by Malcolm J. Ratchford on the 29<sup>th</sup> day of August, 2014.

  
NOTARY PUBLIC  
My commission expires: 2-11-17

## CERTIFICATE OF SERVICE

I hereby certify that on September 4<sup>th</sup>, 2014, a true and accurate copy of the foregoing Motion to Adopt Testimony was served by United States mail, postage prepaid, to the following:

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