

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case #2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Aaron Viles [REDACTED]
Sent: Wednesday, November 18, 2020 8:07 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case #2020-00174

To whom it may concern,

The Kentucky Power Co. rate case represents a huge step backwards for residential solar in Kentucky. Please reject efforts to create hurdles and financial disincentives for roof top, consumer-owned solar installations.

From climate change to solar jobs as well as energy freedom, the benefits of the current, net metering, one to one KW in, KW out system should be maintained.

Additionally, raising rates during a pandemic-fueled economic crisis is tone deaf and reprehensible.

You must require Kentucky Power to perform a cost-of-service study to document the claims it is making in this rate case.

Please stand up for rate-payers, our climate, and common sense in our commonwealth and reject KPC's efforts to raise our rates and destroy the existing net metering programs.

Sincerely,

Aaron Viles
4789 Willman Way
Lexington, KY 40509

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case_2020-00174
Date: Wednesday, November 18, 2020 8:31:00 AM
Attachments: [PSC 11162020.pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Adrienne Bush [REDACTED]
Sent: Monday, November 16, 2020 7:28 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case_2020-00174

Please see the attached comments for the record.

--

Adrienne Bush
Executive Director



306 W. Main St., Ste. 207
Frankfort, KY 40601



www.hhck.org

Pronouns: she/hers

Get the latest on housing advocacy in Kentucky - sign up for our [email list](#).



November 16, 2020

Public Service Commission
P.O. Box 615
Frankfort, KY 40602-0615
Via email: psc.info@ky.gov

Re: Case No. 2020-00174

Dear Commissioners:

The Homeless and Housing Coalition, established in 1987, represents affordable housing developers, homeless service providers, and interested advocates with the mission of eliminating the threat of homelessness and fulfilling the promise of affordable housing. On behalf of HHCK and our housing developer members, thank you for the opportunity to submit the following comments in the net metering rate case.

We have several nonprofit organizations who have expanded their solar building techniques and portfolios, passing the energy savings onto low-income homeowners, under the old net metering statute. Our members would like to continue renewable energy development, but it is still expensive, and it is unethical, not to mention impractical, to pass on development costs onto the low-income homeowners. With this solicitation of comments, we urge you to consider the social benefits of net metering in this rate increase application. Kentucky's housing stock is overall aging, with the effects of the Great Recession stagnating new home development. From our 2018 Housing Needs Assessment:

“The median age of housing (34 years) has increased since 2000 (when it was 27 years), since new construction has not replaced older units at the same pace (Kentucky Housing Corporation, 2015), which may indicate that the housing stock available is less energy efficient Page 6 – Housing Needs Assessment and habitable than newer units would be. The Housing Assistance Council (n.d.) reports that 28.4% of units are “inadequate housing,” which may be a combination of incomplete plumbing, kitchen facilities, overcrowding, or cost burden.”¹

Energy-efficient homes are a social as well as economic benefit at the household and community levels, and one that should be considered in Kentucky Power Company's application for a rate increase. Workers need homes affordable to them, energy efficient homes are critical to affordability, and the ability to diversify building and remodeling practices through net metering are critical to nonprofit housing developers in Eastern Kentucky being able to continue their work.²

¹ <https://www.hhck.org/s/HHCK-Housing-Needs-Assessment-12202018.pdf>

² <https://wfpl.org/kentucky-power-seeks-to-devalue-rooftop-solar-raise-rates-in-eastern-kentucky/>

306 W. Main Street, Suite 207
Frankfort, KY 40601

www.hhck.org





Further, it is our understanding that there is a perception that net metering provides an unfair subsidy for customer generators at the expense of all ratepayers, and that since the old policy was first implemented in 2003 and updated in 2008, it is no longer necessary. We would argue that is not the case here in Kentucky. While national patterns many indicate that the market's playing field between traditional and renewable energy generation has been leveled, Kentucky is different.

Our levels of renewable energy penetration remain comparatively low with other states who have renewable energy portfolio standards and policies that effectively encourage development in the private and nonprofit sectors. We urge you to consider this imbalance in Kentucky Power Company's application for a rate increase.

Now, in the middle of a global pandemic, is not the time to raise rates. It has become clear by the governor's allocation of \$15 million to the Healthy at Home Utility Relief Fund³ that customers have experienced severe economic hardship as a result of the onset of the novel coronavirus. Further, this rate increase application is regressive, as low-income Kentuckians in persistently impoverished communities, such as Kentucky Power's service care, will pay more as a percentage of their income than higher-income folks.

Again, thank you for the opportunity to comment in this important public decision. Please feel free to contact me should you need additional information.

Sincerely,

A handwritten signature in black ink that reads "Adrienne S. Bush".

Adrienne S. Bush, MPA
Executive Director

/asb

³ <https://kentucky.gov/Pages/Activity-stream.aspx?n=GovernorBeshear&prId=422#:~:text=The%20executive%20order%20designates%20%2415,wastewater%20or%20electric%20service%20disconnection.>

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: case number 2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Alice [REDACTED]
Sent: Monday, November 16, 2020 8:48 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: case number 2020-00174

Written Comment:

Public Service Commissioners:

I am writing as both an advocate of increasing incentives to adopt distributed solar power everywhere, and as someone with kin who is directly affected by the proposed changes. Globally, distributed solar is recognized as a means to decrease carbon emissions and dependence on fossil fuels (save some for seven generations down the road, please, when maybe we have better ways to mitigate the global heating impacts). For Lisa Kennard, whose house was destroyed by the tornado in West Liberty, this proposal is disastrous. She was blessed to be rehoused in a new, very efficient home built by Habitat for Humanity which included a solar installation. She works as a pharmacy tech, which doesn't pay as well as the title makes one think. She uses less power than her home produces every month, pushing power onto the grid with a carbon footprint (including carbon emissions embodied in the production of the panels themselves)/unit of power which steadily decreases the longer they are in service. She works days and is home at night, using her temperature control, entertainment center, and lighting. This proposal hits her as hard as any rate structure that a person could devise if they were *trying* to pinch her limited income.

I am writing to advocate that you reject Kentucky Power's basic argument that wealthier

people who can afford to buy solar panels are shifting costs off on lower income people who do not. Non-profits who serve needy people across Kentucky Power's service area are using solar to get their high utility bills under control and free up money to do their critical work at a time of so many critical needs in the region. Independent-minded people who own their own homes, sometimes family homes which have been passed down, can invest in home solar systems to decrease their monthly bills so they can survive with irregular work, in sectors like in home repair or farming, or as self-employed people with small businesses getting by in a recession and a pandemic. Trying to paint solar advocates as rich folk pushing their costs onto the poor *regular* people who just buy what Kentucky Power produces and sends them is disingenuous.

Kentucky Power's proposal would raise the average power bill by more than \$20/month, with the bulk of the increase in the base charge. Since the cost of natural gas and coal that Kentucky Power uses for fuel is at rock bottom right now, I guess they are trying to justify this because of work on the grid itself, and they are trying to make it seem like distributed solar is a real factor in this cost. Fewer than fifty people in their territory are using grid-tied solar, and research from across the country shows that at this low-rate of home solar power generation the impacts on the distribution costs of utilities are practically imperceptible. Putting more of the increase on the base charge and less on the per kilowatt charge punishes people who make efforts to use less power, which can't be squared with Kentucky Power's message that they are trying to change their net metering rates to protect the bulk of rate payers.

Reward people for making changes that allow them to use less power. This is what is needed to adjust our economy and infrastructure to new realities. Make a stable investment environment for distributed solar so people can foresee their payback period and make solar a viable option for a medium-term home improvement investment which pays for itself in savings. This is what is needed to adjust our economy and infrastructure to new realities.

Alice Melendez

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: 2020-00174
Date: Thursday, November 19, 2020 3:23:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: Allene Staten [REDACTED]
Sent: Wednesday, November 11, 2020 3:53 PM
To: PSC Meeting <PSC.Meeting@ky.gov>
Subject: 2020-00174

As a resident of Lawrence County and widowed and live on Social Security and a fixed income I cannot afford another rate hike from Kentucky Power . We are in a pandemic with everything costing more , most of Lawrence County just makes minimum wages exception of teachers..my income is just enough that I cannot get help with heating assistance and still one person and one income in my home. I am a senior citizen and it is hard enough to make it .I oppose this rate hike.
Allene Staten 47 Woodlands dr Louisa Kentucky 41230 Sent from my iPad

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: case number 2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Amanda Fuller [REDACTED] >
Sent: Wednesday, November 18, 2020 10:42 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: case number 2020-00174

Hello Public Service Commission,

I bought my first home a decade ago, and I look forward to staying in my home a long time into the future. One of the first things I wanted to do with my new home was to exercise my energy freedom, and save money by installing solar panels. I installed a modest 4kw system on my roof knowing that it would save me thousands of dollars over its useful life, reducing my bills and helping keep Kentucky's air clean. I'm pleased to own my own energy generation and exercise my freedom to choose where my electricity comes from. My solar panels produce nearly all the electricity I use and my bills are very affordable. I want all Kentuckians to have this choice!

We bought our solar panels from an American company and hired a local solar installation company for the project. My energy choices support local entrepreneurs and a clean energy economy, and I want Kentucky to benefit from this.

Now is not the time to assess rate increases on users. Utility companies have yet to prove that net metering is having a negative impact on customers.

Please do not change the net metering compensation rate. Changes proposed in case # 2020-00174 to the net metering tariff would sharply reduce the value of solar generation for future net metering customers. These changes would place solar customers into a complicated time-of-use rate structure and would greatly under-value excess solar generation fed back to the utility. This filing also proposes large rate increases for residential customers - a 25% increase to both the fixed customer charge and the energy charge. This makes renewable energy much less affordable and appealing to residential

customers which is the wrong message for Kentuckians who need more affordable and sustainable energy solutions.

Thank you

--

Amanda Fuller
800 Goullon Ct
Louisville KY 40204



From: Bruner, Brandon S (PSC) on behalf of PSC Executive Director
To: [REDACTED]
Subject: RE: 2020-00174
Date: Wednesday, November 18, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Amy Elyse Waters [REDACTED]
Sent: Monday, November 16, 2020 10:03 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: 2020-00174

To whom it may concern at the Ky Public Service Commission:

I'd like to strongly advise that the PSC encourage big utility companies to embrace and foster - and stop blocking - the rise of clean energies like solar in Kentucky. We are a state full of poor people who need a break in their bills, and renewable energy with the cooperation of utilities can make this simple ask possible. Kentuckians are tired of big utilities throwing their weight around, and the people and the solar industry deserve a fair shake. We finally have a technology that is clean and feasible - what - other than utility greed - could possibly stand in the way of making this our future?

Thank you for providing this hearing on this important topic.

Sincerely,
Amy Waters
539 E. Oak St.
Louisville, KY 40203
[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: [REDACTED]
Sent: Wednesday, November 18, 2020 9:32 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

I am writing to express my thoughts on Case-2020-00174.

Utility companies already have their guaranteed profitability insured. Further profits for shareholders should not be on the backs of we the people serviced or on those who have invested in solar themselves. There is no problem with Kentucky's current net metering. The Public Service Commission should require KPE to do a study to prove claims before there are any rate increases. And any increases should not be on access to energy which impacts the poorest in our communities..

Solar energy is vital to help our climate and would also create additional jobs in Kentucky.

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case Number: 2020-00174
Date: Tuesday, November 17, 2020 8:18:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: berma matthews [REDACTED]
Sent: Saturday, November 14, 2020 8:41 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case Number: 2020-00174

To Whom It May Concern,

I serve on the board of directors of Housing Oriented Ministries Established for Service, Inc., a nonprofit organization who has provided affordable housing solutions in Letcher and surrounding counties for thirty-six years. We are opposed to the proposed net metering changes being proposed by KY Power. Our community is struggling in the aftermath of the coal industries decline. Small businesses are struggling, Families are struggling now we are in the midst of a world-wide pandemic. Now is not the time to introduce changes that will kill the installation of roof top solar in our community. We have seen first hand how helpful this has been to our own nonprofit and seven other local businesses in Letcher County. These businesses provide employment and services our community desperately needs.

Therefore, for the good of our community we are asking as community members that you not approve this net metering proposal that is before you.

Sincerely,

Berma Matthews
32 Berma Road
Letcher, KY 41832

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: comments on case #2020-00174
Date: Wednesday, November 18, 2020 2:34:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Carrie Ray [REDACTED]
Sent: Tuesday, November 17, 2020 4:09 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: comments on case #2020-00174

Dear Commissioners,

My name is Carrie Ray, and I'm the Energy Programs Coordinator at the Mountain Association. We are intervening in the Kentucky Power rate case (#2020-00174), but I want to share some of my own comments and concerns about how this rate increase will affect the small businesses, non-profits, and local governments we work with across Kentucky Power's territory.

The most obvious impact is the rates themselves. In a review of 264 of our client accounts, there will be a total annual increase of \$737,168, based on rates alone. (This is 201 GS accounts, 39 RS accounts, and 34 LGS accounts.) **This is over three quarters of a million dollars coming out of our communities every single year.** This does not include attendant increases in taxes, franchise fees, and surcharges, which can be substantial. Breaking it down by sector, we will see the following impacts:

- Non-profit: 89 accounts, \$66,087 in additional annual electric costs, 15.2% average increase
- Local Government: 62 accounts, \$80,513 in additional annual electric costs, 13.7% average increase
- Healthcare: 65 accounts, \$390,236 in additional annual electric costs, 14.2% average increase

- Small Business: 43 accounts, \$195,492 in additional annual electric costs, 13.5% average increase
- Addiction Recovery: 15 accounts, \$8,112 in additional annual electric costs, 13.7% average increase

These are costs are significant, and for many of our clients, unsustainable. As I mentioned, these costs do not include the increases in Decommissioning and Environmental surcharges, which are already adding large charges to our clients' bills. At the same time, Kentucky Power customers will be losing the Federal Tax Credit, costing them even more.

Kentucky Power is one of the few eastern Kentucky electric companies that charges nearly all of its commercial clients for demand, beginning at just 10 kW per month. This demand charge will have gone up over 350% since 2016, and with the rate restructuring in 2017, many small commercial customers are now paying demand charges they weren't faced with before. These charges can be enormous, and confusing – many folks we work with don't understand what it is, or how simple behavioral changes can help them reduce it. (The fact that Kentucky Power hides these charges on the bill is another issue, which I will address later.)

Let's look at a few specific examples of how our clients will be impacted.

A Floyd County grocery store, operating on an LGS account, will see an increase in bills of \$11,960 per year, about 13.8%. They can also add an additional 10% or so, thanks to the Decommissioning Rider and the Environmental Surcharges. At the same time, they'll lose the approximately \$1,430 per year credit they get from the tax credits. This is a grocery store located in an area where, according to the USDA, "a significant number of residents are more than 20 miles from a grocery store." Grocery stores operate under some of the tightest margins in the business world, and an over \$12,000 increase in bills is not something that can easily be overcome. It is reasonable to expect that prices on groceries would rise (something many community members can ill afford), layoffs or wage cuts would happen, or that the store could even be forced to close.

A Perry County city hall will see a \$2,185 annual increase in its bills. A Floyd County town's bills will increase over \$1,800 from just three of its accounts. A southeastern county government will have to come up with an additional \$29,200 per year to pay its Kentucky Power bills. A municipal water and sewer district will face a nearly \$31,000 increase. These are places that are already having to cut essential services due to massive revenue shortfalls. Where will this money come from?

Non-profits form the backbone of many of eastern Kentucky's small towns, providing services that local governments cannot afford to. And yet many of these places are facing the highest increases due to the nature of their operations and the sky-high demand charges – indeed, in our client analysis, the non-profit sector's bills would go up by an average of 15.2%, higher than any of the other sectors. Just a few of the impacts include a Perry County childcare center, \$2,200 increase; a Leslie County community center, \$1,700 increase; a Floyd County school, \$3,000 increase.

I'd like to shine a spotlight on one of our clients who stands to be the most affected by this increase: Red Bird Mission, deep in the mountains of Clay and Leslie Counties. It's actually divided between two electric services, Kentucky Power and KU. This is a place that we have proudly worked with for years on reducing their crippling electric bills. Red Bird provides essential services and employment to a very remote area – it runs a dental clinic, provides elder housing, hosts a community store, and

operates a school, among other things. They operate on the tightest of budgets – and the impact from this rate increase will be *over \$25,000 a year*. How can they expect to continue to operate with an increase like this?

These are just a few examples of how Kentucky Power's actions will have real, tangible effects on their ratepayers, during a global pandemic when so many are already suffering. And consider the reason why they want this impact: to ensure that their shareholders get more money. Not because they too are struggling to keep their business running to provide essential services to people in need, but because they don't think a 6% return on their investment is enough, even when economies around the world are gasping for air. This is unconscionable, and requires a serious and immediate rethinking of how our for-profit utilities operate in Kentucky.

Net Metering

Others with more technical knowledge than myself will offer many expert opinions on why the proposed net metering rate is warrantless. I do know that Kentucky Power has offered no evidence to support its claims, that a miniscule number of its customers have installed rooftop solar, and that gutting the existing rate will have a devastating impact on many of our clients.

After the 2017 rate increase, interest in rooftop solar began to grow exponentially among our clients as a way to control bills that were spiraling out of control. Removing this opportunity for commercial customers is not just a blow to the burgeoning solar industry in the region, but also to non-profits, business owners, and local governments who are looking to solar as a way to keep their doors open. Kentucky Power is raising rates and removing any opportunity for customers to get control of their bills at the same time – a massive double-blow.

Sales Tax

Up until recently, Kentucky Power was refunding non-profit customers who were erroneously paying sales tax on their accounts. Recently, they stopped doing this. In their response to the Joint Intervenors' questions, Kentucky Power asserted that they could not refund the taxes because it would be impossible to know how far back to go. In addition to the fact that they have, in fact, already been doing this for multiple years, the Tax Exempt Certificate provided to Kentucky Power by the non-profit shows a date of incorporation, making it easy to see how many years' worth of taxes should be refunded. On top of this, this is money that Kentucky Power gets from the state, it's not money out of their own pockets. These funds can be very beneficial to these non-profits, totaling thousands of dollars. Since 2018, we have found over 20 Kentucky Power non-profit customers paying sales tax.

Rate Billing

Finally, I would like to ask the PSC to instruct Kentucky Power to itemize the "Rate Billing" section of their bills. Currently, it combines base fees, usage charges, and demand charge (where applicable). Combining these together makes it difficult for a customer to know exactly how much of their bill is being spent on electric usage vs. demand vs. the base fee. This is especially important for enterprises who are paying large demand charges and in many cases don't even know it.

I appreciate your attention to these issues. Electricity is a necessity, but one that our clients and the

region as a whole can ill-afford to pay more for, especially now.

Best,
Carrie Ray
Energy Programs Coordinator
Mountain Association
433 Chestnut St
Berea, KY 40403859-544-0023
[REDACTED]
Home address: 331 Stratford Dr
Lexington, KY 40503



mtassociation.org

We changed our name.
[Here's why.](#)

Carrie Ray
Energy Programs Coordinator
She/her

EMAIL: [REDACTED]
OFFICE: [REDACTED]
MOBILE: [REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Comments for Kentucky Power's Rate Request No. 2020-00174
Date: Tuesday, November 17, 2020 8:29:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: AARP <[REDACTED]>
Sent: Monday, November 16, 2020 4:17 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Comments for Kentucky Power's Rate Request No. 2020-00174

Nov 16, 2020

Public Information Office
KY

Dear Office,

I urge the Kentucky Public Service Commission to ensure that Kentucky Power's rate proposals are fair to residential customers (PSC DOCKET 2020-00174).

The proposed 16% residential increase is high and places an unfair burden on residential customers - especially during a pandemic.

In addition, increasing the basic customer charge unfairly adds to the burden on many older

Kentucky Power customers, who generally use less electricity. Kentucky Public Service Commission should oppose fixed charges and instead favor a low customer charge that only recovers metering and billing costs.

I don't understand why they are including smart meters in the proposal for an upgrade, They installed mine a few years back. It also seems odd that they would change from coal to natural gas at the local power generator station, cutting their own workforce and probably causing some coal producers to cease production, reducing their energy requirements.

Due to so many businesses being impacted by this pandemic, is there some way this can be postponed for a year or longer, to see what the long term impacts might be on their customer base, and potentially revisit the proposed changes on residential rate increases?

Utility rates are an essential pocketbook issue for people age 50-plus and their families, many of whom struggle to balance paying utility bills and other household expenses along with buying food and medicine.

Please prevent the unfair Kentucky Power residential rate hike proposals.

Sincerely,

Mr. CHARLES ROBINETTE
2405 State Route 1458
Flatwoods, KY 41139

[REDACTED]
[REDACTED]

From: Bruner, Brandon S (PSC) on behalf of PSC Executive Director
To: [REDACTED]
Subject: Ky power rate increase
Date: Tuesday, November 17, 2020 8:17:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Chasity Gibson [REDACTED]
Sent: Saturday, November 14, 2020 8:24 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Ky power rate increase

I just seen that Ky power is proposing another rate increase. My family live in eastern Ky in the small city of hyden. They get their power from Ky power. My family already has an a outrageous utility bill from them as it is. As well as during the coronavirus when utility companies said they would not disconnect customers, they disconnected my families. My mom is disabled and on a fixed income. She simply can not afford her utility bill to increase even more. She lives in a small 3 bedroom home and her recent Bill's have been in excess of \$500 a month. Like I said earlier she is on a fixed income and her social security covers her Bill's and thats it. She can't even get her vehicle fixed or come visit her grand daughter and I because she doesn't have the money. Please do not approve this increase. My mom as well as other eastern kentuckians are struggling enough already. If anything their bills should be reduced. Ky power is the worst power company I have ever seen. They are all about the money and could care less about the customers that they provide power to. I live in Monticello ky and thank God my power isn't my utility company. Skrecc provides my power and they actually care about their customers. I just wish they could be my moms provider because they would work with her and not against her. Her utility bill would be much more affordable as well. Please take my words into consideration when you are making your decision to approve or deny the rate increase. Think about all the eastern kentuckians who would have to choose between food, clothes for their children or paying their electric bill. They would have to choose between necessities in life for their families and keeping the lights and heat on this winter. Christmas is also fast approaching. Ky power has asked for a rate increase 5 times in 5 years and been approved. I think it's time to deny them and show that you are for the people

instead of the money hungry corporations.

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174, Public Comment
Date: Monday, November 23, 2020 10:21:00 AM
Attachments: [2020-00174 C. Hutchison Public Comment Signed.pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Monday, November 23, 2020 8:38 AM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Case 2020-00174, Public Comment

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

From: Chris Hutchison [REDACTED]
Sent: Thursday, November 19, 2020 8:48 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>; [REDACTED]
Subject: Case 2020-00174, Public Comment

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

To whom it may concern, please find my attached public comment in regards to PSC Case 2020-00174 in regards to a rate increase request by Kentucky Power Company.

Chris Hutchison
1484 Court of Three Sisters
Ashland, KY 41102

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Chris Tobe [REDACTED]
Sent: Wednesday, November 18, 2020 5:52 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

- Customer-owned solar power, "energy freedom" and solar jobs *matter* PSC must require KPC to do a "**cost-of-service study**" to **prove** its claims against net-metering, before approving rate changes.
- Raising mandatory, flat fees harms low-income households and creates a "perverse incentive" against energy-efficiency investments and/or that raising rates during a pandemic is unconscionable.
- Balance public interests against private greed.

--

Chris Tobe, CFA, CAIA
[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Comments for PSC Case Number 2020-00174
Date: Wednesday, November 18, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Colin Goggin [REDACTED]
Sent: Monday, November 16, 2020 10:24 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Comments for PSC Case Number 2020-00174

Kentucky Public Service Commissioners,

I am writing to express my opposition to the proposed compensation rate changes for net metering in Kentucky. The topic of rooftop solar regulation is important to me as a citizen concerned about this state's path to a clean energy future. This important case will be precedent-setting for all Kentucky utilities, net metering customers, the rooftop solar industry, and Kentucky's future energy infrastructure. It therefore deserves an appropriate level of consideration including a value of solar analysis to weight benefits not being considered at this time.

Changing the current net metering rate structure is wrong at this time for the following reasons:

- 1) Kentucky Power refers to cost shifts, but at the current low level of solar penetration in its service area those cost shifts are certain to be negligible. If a fair analysis was to be done on all cost shifts that exist for every utility, those attributable to Kentucky Power's solar customers would be near the bottom of a very long list. Demonstrating a solar cost shift sufficient to change a net metering rate requires a comprehensive value of solar analysis to appropriately balance the costs and benefits of rooftop solar for a given utility (and is typically not justified unless rooftop solar penetration reaches the 5-10% level). Simply saying there is

a cost shift while ignoring its practically negligible current magnitude means that this request should not be granted serious consideration. It is simply a waste of this commission's scarce and valuable time. In addition, the currently proposed rate and time of day structure is an arbitrary means to devalue rooftop solar and has no relation to the actual value of the power that solar customers currently produce. Detailed studies from other utilities with similar low solar penetration in fact show that even at the current 1:1 compensation rate, solar customers' generated power is being greatly undervalued.

2) Should this commission agree to the proposed lower net metering reimbursement rate, it would set a precedent for all other Kentucky utilities. This would be a significant setback for the Kentucky rooftop solar industry and its future customers. The proposed credit rate would make it economically impractical for virtually anyone to install a system. It would be a shameful outcome given the current lack of appropriate analysis that should be requisite for such impactful decisions.

3) It is currently critical for all stakeholders in our state's energy infrastructure to be focused on reducing and not entrenching our use of fossil fuels. We should be focused on reducing emissions and the changes required of everyone towards that goal. Rooftop solar is a means to help both Kentucky Power and its customers to do just that.

I ask that you please honor your responsibility to defend the overwhelming public interest in this case and not grant the requested net metering compensation changes being sought by Kentucky Power.

Thank you for your consideration of my comments and your service to the citizens of our state.

Colin Goggin
3324 Lyon Dr.
Lexington, KY 40513

From: Bruner, Brandon S (PSC) on behalf of PSC Executive Director
To: [REDACTED]
Subject: RE: Case Number 2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Martin, Courtney [REDACTED]
Sent: Monday, November 16, 2020 6:50 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>; rateintervention <rateintervention@ky.gov>
Subject: Case Number 2020-00174

Dear Public Service Commission and the Office of Rate Intervention,

This email is regarding Case Number 2020-00174. I am a Kentucky resident, a concerned citizen, and advocate for our beautiful state. Kentucky Power's proposal to increase utility rates during a global pandemic and make rooftop solar less affordable is deeply troubling. I am hopeful you will decide to protect citizens during the pandemic, and every day, by keeping power affordable. Below are the reasons I am opposed to the current proposal.

Any action that could rate energy rates during a pandemic when many people are unemployed is cruel. Kentucky Energy's proposal would increase the average monthly bill by \$23.16, or 16%, making it harder for eastern Kentuckians to make ends meet. It is essential we keep energy affordable.

1:1 Net Metering is simple and fair. Any attempt to alter net metering to favor destructive fossil fuels over rooftop solar is an attack on Kentuckians. Low and middle-income people deserve the option to pursue rooftop solar.

I am currently renting a home, but I hope to one day be a homeowner. *Rooftop solar will be an essential resource in order for me to pursue this dream.* Proposals like this one threaten the future I hope to have. Adjusting energy policies, especially during a pandemic, dramatically affect the lives of people like me. This is not a decision to be made under the unique circumstances of COVID-19. *Now is not the time; reject Kentucky Energy's proposal.*

Best,
Courtney Martin
Assistant Coordinator of Resource Conservation
Western Kentucky University
[Go Green, Go TOPS!](#)

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Rate Increase
Date: Thursday, November 19, 2020 3:23:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: David Wayne [REDACTED] >
Sent: Wednesday, November 11, 2020 7:24 PM
To: PSC Meeting <PSC.Meeting@ky.gov>
Subject: Rate Increase

You people need to stop raising our rates. You can make less money and still make plenty. Stop paying so much for the white collar positions.
Sent from my iPad

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: Comments to Kentucky Public Service Commission regarding Case Number 2020-00174
Date: Monday, November 23, 2020 10:31:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Monday, November 23, 2020 8:36 AM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Comments to Kentucky Public Service Commission regarding Case Number 2020-00174

From: Elaine Nations [REDACTED]
Sent: Thursday, November 19, 2020 1:12 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Comments to Kentucky Public Service Commission regarding Case Number 2020-00174

Comments to Kentucky Public Service Commission regarding Case Number 2020-00174

As a net metering customer of Louisville Gas & Electric, I am opposed to changing net metering rates in Kentucky. Now is not the time. There are no pressing reasons to change net metering rates now, and many reasons NOT to:

- Changes made now to the net metering rate would be based on very limited information, to mitigate a nonexistent problem, and would set a bad precedent for the state.
- Utility companies claim that cost-shifting is happening, but provide no evidence. Research has established that cost shifting is negligible until distributed solar reaches

5-10% of the grid penetration. Kentucky Power lists only 44 net metering customers, which amounts to approximately 0.04% of net metering penetration in the grid. It doesn't make sense to even consider changing the net metering rate at this time. Cost shifting is a nonexistent problem at this point, and is likely to remain so for the foreseeable future. This is an attempt by utility companies to control customers' ability to own their own solar.

- 1:1 net metering is fair and simple. It's easy to administer and understand.
- Kentucky Power is asking for time of use valuation of solar based on arbitrary timeframes (which don't even match their own "time of use" timeframes), to prevent solar users from being able to use energy they produced during daylight hours in the evenings. That is ridiculous. As a long-time utility customer, I know that energy companies have long encouraged customers to limit their electricity use during peak hours on hot summer days. There is no question that excess energy produced by solar users during those peak hours is worth MORE to utility companies, not less!
- Utilities continue to argue that solar users disproportionately impact poor and low-income customers. That is unproven. However, it's very clear that raising the fixed monthly charge for those same poor and low-income customers DEFINITELY impacts them. It also dis-incentivizes energy efficiency.
- Finally, the health and environmental benefits of distributed solar should be considered. "Avoided cost" valuation completely ignores those benefits.

Beyond the impacts to solar users, Kentucky Power's rate case is just another attempt to raise rates for Kentuckians already struggling to pay their bills and discourage energy efficiency.

Elaine Nations
13020 Mitchell Hill Rd
Fairdale, KY 40118

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: Energy Freedom = Thwarting Utility Efforts to Control ROI on Generation Assets Large and Small(Case # 2020-0174)
Date: Monday, November 23, 2020 10:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Monday, November 23, 2020 8:37 AM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Energy Freedom = Thwarting Utility Efforts to Control ROI on Generation Assets Large and Small(Case # 2020-0174)
rom: Elisa Owen <[REDACTED]>
Sent: Thursday, November 19, 2020 4:08 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Fwd: Energy Freedom = Thwarting Utility Efforts to Control ROI on Generation Assets Large and Small(Case # 2020-0174)

----- Forwarded message -----

From: **Elisa Owen** [REDACTED]
Date: Thu, Nov 19, 2020 at 4:01 PM
Subject: Energy Freedom = Thwarting Utility Efforts to Control ROI on Generation Assets Large and Small(Case # 2020-0174)
To: <psc.info@ky.gove>

Dear PSC KY Commissioners:

I ask that you do your part to reject monopoly utilities' attempt to undermine incentives for customers to move toward clean power by pushing through unfair rates for buying and selling solar energy. Before you assume that utilities have anything other than preserving their status

as monopoly power generators in their minds as they try and convince you they need to charge varying rates for the same KW of energy, please make them prove their claims against net metering by ensuring they do a cost of service study. We should not risk the future of our planetary climate health by showing deference to utilities who have a vested interest in keeping monopoly control of generation assets large and small. We also should not sacrifice the creation of thousands of modern, sustainable, clean energy high paying jobs to companies who have sunk investments in the fossil fuel status quo. Please force utilities to prove their case before rushing through what is likely a baseless, short sighted request to construct a playing field that jeopardizes a truly competitive energy generation market.

Kind Regards,

Elisa

Elisa Owen
Transitional Assistant Pastor
Christ Lutheran Church

[REDACTED]

--

Elisa Owen
Transitional Assistant Pastor
Christ Lutheran Church

[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Power bill increase
Date: Thursday, November 19, 2020 3:23:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: Elvie Akers [REDACTED]
Sent: Wednesday, November 18, 2020 1:43 AM
To: PSC Meeting <PSC.Meeting@ky.gov>
Subject: Power bill increase

I'm coming from a little known place in a poor county in eastern Kentucky and speaking for a lot of people that I know cannot afford their power bills now. We are now going to be faced with losing electricity or having something to eat! Times are hard and now you are going to kick us? Help your community in their time of need and not take us on out!

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE:
Date: Tuesday, November 17, 2020 8:27:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: greg whitaker [REDACTED]
Sent: Monday, November 16, 2020 8:59 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject:

Case Number: 2020-00174

To Whom It May Concern,

I serve on the board of directors of Housing Oriented Ministries Established for Service, Inc., a nonprofit organization who has provided affordable housing solutions in Letcher and surrounding counties for thirty-six years. We are opposed to the proposed net metering changes being proposed by KY Power. Our community is struggling in the aftermath of the coal industries decline. Small businesses are struggling, Families are struggling now we are in the midst of a world-wide pandemic. Now is not the time to introduce changes that will kill the installation of roof top solar in our community. We have seen first hand how helpful this has been to our own nonprofit and seven other local businesses in Letcher County. These businesses provide employment and services our community desperately needs.

Therefore, for the good of our community we are asking as community members that you not approve this net metering proposal that is before you.

Sincerely,
YOUR NAME
Address

Gregory S Whitaker
488 Burton Hill
Blackett Kentucky 41804
[Sent from Yahoo Mail for iPhone](#)

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE:
Date: Tuesday, November 17, 2020 8:27:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: greg whitaker [REDACTED]
Sent: Monday, November 16, 2020 9:05 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject:

Number: 2020-00174

To Whom It May Concern,

I serve on the board of directors of Housing Oriented Ministries Established for Service, Inc., a nonprofit organization who has provided affordable housing solutions in Letcher and surrounding counties for thirty-six years. We are opposed to the proposed net metering changes being proposed by KY Power. Our community is struggling in the aftermath of the coal industries decline. Small businesses are struggling, Families are struggling now we are in the midst of a world-wide pandemic. Now is not the time to introduce changes that will kill the installation of roof top solar in our community. We have seen first hand how helpful this has been to our own nonprofit and seven other local businesses in Letcher County. These businesses provide employment and services our community desperately needs. Therefore, for the good of our community we are asking as community members that you not approve this net metering proposal that is before you.

Sincerely,

YOUR NAME

Address

Gregory S Whitaker
488 Burton Hill

Blackett, Kentucky 41804
[Sent from Yahoo Mail for iPhone](#)

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Comments for Kentucky Power's Rate Request No. 2020-00174
Date: Tuesday, November 17, 2020 8:18:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: AARP [REDACTED]
Sent: Saturday, November 14, 2020 6:20 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Comments for Kentucky Power's Rate Request No. 2020-00174

Nov 14, 2020

Public Information Office
KY

Dear Office,

I urge the Kentucky Public Service Commission to ensure that Kentucky Power's rate proposals are fair to residential customers (PSC DOCKET 2020-00174).

The proposed 16% residential increase is high and places an unfair burden on residential customers - especially during a pandemic.

In addition, increasing the basic customer charge unfairly adds to the burden on many older Kentucky Power customers, who generally use less electricity. Kentucky Public Service Commission should oppose fixed charges and instead favor a low customer charge that only recovers metering

and billing costs. The customer charge should not be increased. Using these fees to install smart meters is unnecessary and I also question the timing of this proposal.

Utility rates are an essential pocketbook issue for people age 50-plus and their families, many of whom struggle to balance paying utility bills and other household expenses along with buying food and medicine.

Please prevent the unfair Kentucky Power residential rate hike proposals.

Sincerely,

Ms. Gwen Johnson
2738 State Highway 317
2738 State Highway 317
Jackhorn, KY 41825

[REDACTED]
[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: Case 2020-00174
Date: Monday, November 23, 2020 10:30:00 AM
Attachments: [KPCOralTestimony.pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Monday, November 23, 2020 8:36 AM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: Case 2020-00174

From: [REDACTED]
Sent: Thursday, November 19, 2020 2:38 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

Dear KPC,
Please find attached for your convenience, a written copy of my oral testimony of Nov. 16 regarding Case No. 2020-000174 (KPC Application).

Sincerely,

Henry Jackson
1000 Rain Court
Lexington, KY 40515-1017

[REDACTED]

PSC/KPC Oral Testimony

By Henry Jackson, Nov 16, 2020

Hello, my name is Henry Jackson. I live at 1000 Rain Ct, Lexington 40515. I'm not a KPC customer but believe this ruling will likely set precedent for other state net metering applications.

I respectfully disagree with the avoided cost calculation in the proposed net metering changes and for three reasons. First, as stated in my written comments, I think there are a wide variety of other factors that ought to be considered in the calculation of a comprehensive cost-benefit analysis.

Second, the method of the avoided cost calculation doesn't justify the stated reason for the application that net customers are being unfairly subsidized by other rate payers. The share of net metering as a part of sold KPC electricity is minuscule as well as for the foreseeable future. As a practical matter, if you were to increase the current KPC total solar transmission by a factor of, say 10 times more net solar power, it would still be well below one percent of KPC peak load capacity. (1)

The third reason I disagree is because the calculation it is based solely on the current KPC business model. Given the steady decline of the coal industry and increasingly warmer Ky winters and related declining sales, it would make sense to at least examine a transition to a new energy business model; the key word here being "transition", which is to say, to not immediately drop fossil fuels but to, instead, examine the possibilities of making profitable venture in the development, maintenance and management of distributed energy and to examine such possibilities prior to further consideration of this application. Please see my written comments for more information as well as an excellent op-ed on this topic in today's NY Times.

The proposed 67% cut in the net metering price will cripple the financial incentive of a growing and competitive solar industry due to, presumably, similar, future commission rulings in other areas in the state. As an example, a net \$10,000 home installation cost financed with a 3% loan, would require a \$150/mo savings to reach a break-even point in about 6 years. The proposed KPC price cut would more than double that pay-back period, more so when you subtract the federal tax credit that will expire two years from now.

If PSC jurisdictions are made uncompetitive in net solar energy despite prevailing market demand, the only places I see left in Ky for solar net metering would be non-PSC utilities such as municipally-owned power service areas. That effect would balkanize the state as to where one might access net solar power putting PSC utility communities at a competitive disadvantage in attracting economic development and growth, not to mention forestalling major opportunity for economic activity and continued

PSC/KPC Oral Testimony
By Henry Jackson
Nov 16, 2020
Page 2

creation of new high paying jobs as documented in my written comments. I urge the Commission to undertake a comprehensive cost-benefit analysis described there.

Lastly, I recognize that responding to these changing market conditions is tough medicine for the heart of coal country. On the other hand, where better to explore the possibilities than an area of the state that testimony has described as economically struggling and would welcome an economic stimulus and the multiplier effects on related industries.

Thank you for your consideration of my comments.

(1) Hypothetical 10-fold increase in current KPC solar power would be 5,800 KWh or 7/1000% of the KPC peak grid capacity of 780 MW -- capacity found on: Page 3: https://psc.ky.gov/pscecf/2020-00174/lmscott%40aep.com/06292020013857/KPCO_APP_Section_I_Application.pdf

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Monday, November 23, 2020 10:21:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Mil Thompson [REDACTED]
Sent: Thursday, November 19, 2020 4:28 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

To the PSC:

I ask the PSC to require KPC to do a cost-of-service study to prove its claims against net-metering, before approving rate changes. This information seems crucial to the case at hand. I do not yet have solar power at my residence, but am interested in it for the future. I have also advocated for my Catholic parish to invest in solar power. This issue is important to me and to our state. Raising mandatory, flat fees harms low-income households and perversely creates an incentive against energy efficiency investments. Raising rates during a pandemic is simply wrong. It is important for PSC to balance the common good against private greed.

Shalom,
Mil Thompson

J. Milburn Thompson, Ph.D.
1730 Harvard Dr.
Louisville, KY 40205
[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Monday, November 23, 2020 10:21:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Jackie Cobb [REDACTED]
Sent: Thursday, November 19, 2020 8:53 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

Dear PSC,

As an engaged citizen, you must be aware that we are in the midst of an environmental crisis of a changing climate caused by too many GHG emissions. This changing climate will cause untold suffering by humankind if not curbed.

Renewable energy - when displacing fossil fuel generated energy - is one incredibly important tool for reducing carbon emissions related in to energy sector.

Customer-owned solar is incredibly important to giving each customer their own energy-freedom to choose what type of fuel they want to provide their energy.

Before approving this proposed rate change, the PSC needs to require KPC to do a cost-of-service study to prove its claims related to net metering.

Jackie Cobb

From: Bruner, Brandon S (PSC) on behalf of PSC Executive Director
To: [REDACTED]
Subject: RE: Case Number: 2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: James Caudill [REDACTED]
Sent: Monday, November 16, 2020 8:47 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case Number: 2020-00174

To Whom It May Concern,

I serve on the board of directors of Housing Oriented Ministries Established for Service, Inc., a nonprofit organization who has provided affordable housing solutions in Letcher and surrounding counties for thirty-six years. We are opposed to the proposed net metering changes being proposed by KY Power. Our community is struggling in the aftermath of the coal industries decline. Small businesses are struggling, Families are struggling now we are in the midst of a world-wide pandemic. Now is not the time to introduce changes that will kill the installation of roof top solar in our community. We have seen first hand how helpful this has been to our own nonprofit and seven other local businesses in Letcher County. These businesses provide employment and services our community desperately needs.

Therefore, for the good of our community we are asking as community members that you not approve this net metering proposal that is before you.

Sincerely,
James Caudill
946 Davidson Branch Road
Hazard, KY 41701

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Kentucky Power Rate Hike
Date: Wednesday, November 18, 2020 2:42:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Ellis, James [REDACTED]
Sent: Tuesday, November 17, 2020 8:41 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Cc: [REDACTED]
[REDACTED]
[REDACTED]
Subject: Kentucky Power Rate Hike

Dear Fellow Citizens,

How much sense would it make for someone in control of the only well in a 5 million square mile desert to begin charging \$1.25 per bucket rather than the dollar they've been receiving for the source of life sustaining water in the middle of a drought? How about if the blood bank all of a sudden increased the price of a unit of blood 25 percent when half of the population is suffering from hemophilia?

That's what you're being asked to sign off on for Kentucky Power's rate heist request. Don't do it. I am not writing for me. I can pay and will pay whatever markup they get. But I work with the poor every day and the one thing they have to pay is the electric bill for themselves and their kids. They don't live in energy efficient domiciles with green this and that because they can't afford it. They live in drafty trailers and apartments and old houses with faulty wiring that makes even plugging in a

portable heater dicey.

And now they're being asked to pay more for the privilege.

Stop this. In the name of decency, of the public protection for which you were constituted, and to stave off yet another assault on the poor and working poor. Stop this.

Sincerely,

James G. Ellis
408 Wilson Ave
Louisa, KY 41230



Sent from [Mail](#) for Windows 10

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Kentucky power increase
Date: Tuesday, November 17, 2020 8:25:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: jamie ball [REDACTED]
Sent: Sunday, November 15, 2020 11:26 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Kentucky power increase

I do not agree with this. This should not be on the backs of the people. It should be paid for by the investors. We are in the mid of a pandemic. Most people have lost their jobs and they are struggling to pay bills and take care of their families. This will make it impossible to do. This isn't the responsibility of the people to pay for. This is the investors and Kentucky's job to pay for the systems they want to implement not the people. The people are already paying more than I think we should and we are already struggling.

Sent from my LG Stylo4+, an AT&T 4G LTE smartphone

From: Bruner, Brandon S (PSC) on behalf of PSC Executive Director
To: [REDACTED]
Subject: RE: Case number 2020-00174
Date: Thursday, November 19, 2020 10:11:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Jerry Hardt [REDACTED]
Sent: Wednesday, November 18, 2020 9:34 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case number 2020-00174

Comments on Kentucky Power proposed rate increase.

I am old enough to remember when we decided, as a state and as a nation, that energy conservation was a good thing. We had national policies and departments in state agencies dedicated dedicated to helping government, communities, companies and individuals use less of our natural resources.

It has been disheartening, as a person who has practiced and benefitted from practicing energy conservation, to see our commitment to and practice of energy conservation be continuously eroded. Such is the case with Kentucky Power Company's proposed new rate structure in at least two ways:

increasing the basic service charge by 25%
creating a rate structure where dollar savings on the use of less energy aren't realized until larger amounts of energy are used (meaning for many homeowners it would make little difference)

This trend toward devaluing energy conservation through such tactics did not start with the current Kentucky Power rate proposal, but the PSC should not let it continue. In fact, I would welcome action by the PSC to reverse this trend and make Kentucky Power and other utilities provide incentives to customers to conserve energy and reinstate some of the conservation

programs they have eliminated recently.

By allowing utilities to slowly over time adopt these policies and practices, the PSC in essence is allowing utilities to set public policy by eroding and reversing the commitment to energy conservation that has been in place for decades. Again, I believe the PSC should not allow this to happen – with the current rate case and others – and should seek to reverse this trend

I also am distressed by Kentucky Power's net metering proposal, which other commenters are fully explaining the problems with. Even before SB 100, Kentucky's net metering laws shut out people like me because of its limitations. Kentucky Power's proposal of course puts net metering even further out of reach for me and others, taking away incentive to invest in what could be a growing industry and job provider in eastern Kentucky, where such an economic boost is certainly needed.

Kentucky Power's arguments make no sense, especially in terms of sharing in the capital costs of its energy infrastructure. All customers already pay high monthly charges for that – and now they want a 25% increase which they will not even use to make rooftop more accessible to all.

Please reject this proposal.

In addition, I know the rate increases would create additional financial hardships for many people. And to do this at a time when there already is widespread economic uncertainty and while asking to further take away realized benefits of conserving energy just seems cruel.

This case provides the Public Service Commission the opportunity to take a more positive role in upholding policies and practices that serve the Commonwealth of Kentucky and its residents. Disincentivizing energy conservation, undermining rooftop solar jobs and increasing financial hardships on many eastern Kentuckians all do the opposite. Kentucky Power's proposal should be dramatically restructured or rejected outright.

Jerry Hardt
PO Box 697
Salysersville, KY 41465


From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Raise
Date: Tuesday, November 17, 2020 8:18:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Jim Maggard [REDACTED]
Sent: Friday, November 13, 2020 6:33 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Raise

Is this a joke, almost Christmas and you raise our utility bills?? Thanks for the early Christmas gift!! Leave it be, people out here are hurting enough, do not add to it!!!

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Written comments, Case No. 2020-00174
Date: Wednesday, November 18, 2020 2:42:00 PM
Attachments: [comments to PSC-2020.pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: [REDACTED]
Sent: Tuesday, November 17, 2020 11:31 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Written comments, Case No. 2020-00174

These follow up on my oral testimony from last night. Thank you. John Rosenberg

Jenny Wiley Chapter AARP
147 Clark Drive
PRESTONSBURG, KENTUCKY 41653

November 16, 2020

Case Number 2020-0174

Public Service Commission

P.O. Box 615, 211 Sower Boulevard

Frankfort, Kentucky 40602-0615

Dear Commissioners:

My name is John Rosenberg. I understand my sound was not consistent when I testified Monday night, so I am forwarding these written comments which largely follow my oral testimony.

I am the Chair of the Jenny Wiley Chapter of AARP here in Prestonsburg, Kentucky. As you know, AARP is a national organization devoted to promoting the wellbeing of adults over 50 years of age.

Many of our members here in the Big Sandy Region are Kentucky Power customers. We oppose the proposed Kentucky power rate increase currently pending before the Commission.

There are almost 31,000 seniors in our five counties and, of those, 4900 are below the poverty line. This is one and a half times the poverty rate in the rest of the state. Even many of those above the poverty line are on fixed income and find meeting their daily expenses to be more and more difficult. You heard some poignant testimony along these lines during the hearing, with our neighbors having to make choices whether to pay for prescription drugs or their electricity bill. A major reason for this predicament has been the constant increase in the cost of utility service. Repeatedly we hear about monthly winter bills in the range of \$500- 1000. Indeed, some years ago one of our local churches had to close its homeless shelter because its monthly utility bill had exceeded \$1000 per month.

The Covid 19 pandemic has exacerbated this situation even more, as others have testified, So, there should be no rate increase for these residential consumers. In that regard, it is totally unfair to propose an increase in the rates of residential customers by 16% compared with just 10% for large non-residential customers. This itself is an unfair cost shifting to residential customers. We know that low income consumers, the most severely affected by rate increases, use less power than other groups, residential and commercial.

The monthly customer charge—the fixed charge customers pay before even turning on the lights—would increase by 25% from \$14 a month to \$17.50 a month. The monthly charge is already too high, and high customer charges make controlling one's energy bill difficult. AARP opposes higher fixed charges and instead favors a low customer charge, if any, that only recovers metering and billing costs.

We are also concerned about proposed special single-issue surcharges such as those proposed for the new smart meters. This proposed surcharge should be rejected. These charges, like other added one-time charges, should be part of base rates that cover long term operating costs.

We believe that solar power should be a viable option for consumers and that any proposed pricing should favor solar customers as much as possible. Throughout this country, states are seeing the benefits of solar as an economical means of providing power, creating jobs, and as a means of addressing climate change; and this Commission should encourage that.

We agree that looking to the future for grid modernization including the use of alternative energy sources is important. However, we again urge the Commission to evaluate these proposals carefully and avoid overloading residential customers, especially those with low incomes with additional special charges.

We urge the Commission to reject the proposed increase. We ask you to bear in mind the hardships which our seniors and other citizens of the region are facing every day in simply trying to afford the basic necessities of life, and the disastrous effect of another rate increase.

Thank you for considering these comments.

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: case number 2020-00174
Date: Wednesday, November 18, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: [REDACTED]
Sent: Monday, November 16, 2020 11:26 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Cc: rateintervention <rateintervention@ky.gov>
Subject: case number 2020-00174

Now is Not the Time. Changes to the net metering rates in this case will set a precedent for the rest of the state and Kentucky is not prepared to make an informed decision that impacts all future net metering rates. In 2019, the state legislature gave utilities the option of exploring new net metering rates with the PSC. It did not demand that the PSC change the existing rate. We know that in order to determine the true value of solar net metering on the grid we need:

- An outside expert to help design the process for evaluating the value of solar, which the PSC has not yet secured.
- Adequate proof from the utility company that cost-shifting is happening, which the utility companies cannot currently prove.

We also know that cost shifting is negligible until distributed solar reaches 5-10% of the grid penetration. Currently, there are so few users that making changes to the net metering rate is unjustified and a waste of the Public Service Commission's valuable time. When we installed rooftop solar 3 years ago, we were stunned to hear how few solar customers there were in the Owen Electric Coop territory. We are nowhere near 10% of the grid penetration!

With so many important issues in front the PSC utility companies should not be pushing for net metering changes to try and mitigate a nonexistent problem that may or may not impact rates sometime in the future.

Thank you.
Joetta Prost
Hebron, KY



From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case_2020-00174_Agenda
Date: Thursday, November 19, 2020 3:24:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: John Cotten [REDACTED]
Sent: Monday, November 16, 2020 1:49 PM
To: PSC Meeting [REDACTED]
Subject: Case_2020-00174_Agenda

John Cotten
70 Stewarts Lane North
Danville, KY 40422
[REDACTED]
[REDACTED]

We routinely install solar in SE KY in the Kentucky Electric Power service area. We are very concerned about the extreme reduction in credit to the customers of future installations. Our customers are not large scale wholesale power producers. It is not fair to compare the independent net metered solar power producer, who produces a few thousand watts of excess power to be

credited back by net metering compared to a large scale power wholesale power producer producing MWs of power per hour or day. The utilities will sell any excess power to the next power requirement at the same profit level with no inbound investment in the production or maintenance of the facilities producing the power other than the actual net meter.

Additionally, a reduction to wholesale levels as being requested by KPC will nearly cut off all net metered solar production in the East Kentucky service region due to the expected reduction in rate of return (ROI) to the customer for their investment.

Please consider the ramifications of the decrease in net metered credit values not only to the end user, but to the over economy of the solar design and installation companies.

John Cotten
General Manager
Wilderness Trace Solar, Inc.
VP Kentucky Solar Industries Association.

--

John Cotten
General Manager
70 Stewarts Lane North
Danville, KY, 40422



www.wildernesssolar.com
www.facebook.com/wts



From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: case number 2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Joshua Thacker [REDACTED]
Sent: Monday, November 16, 2020 4:03 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>; rateintervention <rateintervention@ky.gov>
Subject: case number 2020-00174

Dear Kentucky Public Service Commission officials,

I am writing to oppose a proposed rate increase by Kentucky Power. It is simply irresponsible for Kentucky Power to increase their rates during a pandemic. Many Kentucky residents are hurting at this time. Folks are worried about the health and safety of their families. They are struggling as they work from home and help their kids with online schoolwork. I think about my sister who is teaching from home and my five year old niece who is expected to watch weekly instructional videos online. Others are essential workers, like my brother-in-law who works at a hospital, and must work away from their homes and risk exposure to a dangerous virus. Some folks are out of work due to the pandemic and are struggling to make rent or pay their mortgage payments. This is a very stressful time for everyone.

A rate increase will disproportionately impact the poor, disabled, elderly, and minorities. As a community college instructor, I worry about how a rate increase will impact my students who are primarily low income or working class. Some of my students also care for aging parents or grandparents as they struggle to pay bills and meet their basic needs. Others rely on a fixed income. Please think about those who will be harmed most by a rate increase. These folks are doing the best they can during challenging times. The last thing they need is an additional burden.

Sincerely,

Joshua Thacker

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Joyce Bender [REDACTED]
Sent: Wednesday, November 18, 2020 8:52 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

To the Public Service Commission:

I own my own home and use solar to power it and to provide energy to my local utility. I am retired and living on a fixed income. I cannot afford the steep annual increases in power costs and am grateful to have a predictable cost for the electric utility in my budget.

I felt good seeing the young men working to install my system, knowing that they had good paying jobs for work that provides benefits to our environment as well as our economy. They told me they appreciated the environmental values of their work too. It feels good to have a job that you know has such a positive impact on our planet.

KY Power is asking for a rate increase and wants to skip the cost-of-service study that would prove whether this is warranted. I ask that you require KY Power to conduct this study and prove its claims against net-metering before considering any rate increase request. How can it even be appropriate to seek this rate increase when we are in the middle of a pandemic and so many people are out of work and out of money to pay the rent/mortgage and current utility bills?

Raising these flat fees will harm low-income folks and creates a disincentive for those trying to be more energy efficient. I ask that you balance the public interest against private greed as you consider their request.

Thank you, Joyce Bender

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case #2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Justin Mog [REDACTED]
Sent: Wednesday, November 18, 2020 9:43 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case #2020-00174

Dear PSC,

I'm writing as a Kentucky rate-payer and home solar-power producer to ask that the PSC require KPC to do a cost-of-service study to prove its claims against net-metering, before approving rate changes requested in Case #2020-00174. Researchers calculate these costs to be zero to \$0.01/customer/month, making KPC's request completely unjustifiable. I ask the PSC to live up to its mandate of balancing public interests against private greed in this case.

I know from ten years of personal experience that customer-owned solar power, energy freedom, and solar jobs matter greatly to my family and to the Commonwealth.

In the midst of economic disruption caused by the pandemic, when rate-payers are already struggling to pay their bills, this is most certainly not the time to approve KPC's rate case. Additionally, the state and the PSC are simply not ready to set precedent for net metering rates for the rest of the state. We are not prepared to make an informed decision that impacts all future net metering rates. In order to determine the true value of solar net metering on the grid we need both an outside expert to help design the process for evaluating the value of solar, which the PSC has not yet secured; and adequate proof from the utility company that cost-shifting is happening.

It is also evident that cost shifting is negligible until distributed solar reaches at least 5-10% of grid penetration. Currently, there are so few users that making changes to the net metering rate is unjustified and a waste of the Public Service Commission's valuable time. With so many important issues before the PSC, utility companies should not be pushing for net metering changes to try and mitigate a nonexistent problem that may or may not impact rates sometime in the future. The PSC should rule to not make changes at this time, as was ruled in the recent Arkansas net metering case.

If utilities want to claim cost-shifting they must prove it with utility-specific data, not false claims referencing other states with higher solar penetration rates or studies commissioned by anti-solar think tanks. In Kentucky Power's application they list only 44 net metering customers, which accounts for much less than the 1% cap on solar net metering penetration in the grid (~0.04%).

As my family has seen with the solar panels on our roof over the last decade, the existing 1:1 net metering is simple and fair. It is easy to administer and to understand which makes it an ideal solution for utilities, solar installers and solar customers. If there is a change to how distributed solar is to be credited it must also be easy to understand and administer.

Kentucky Power request for a time of use valuation of solar with strict rules on when net metering credits can be used is clearly based on arbitrary timeframes (8:00 A.M. to 6:00 P.M. and 6:00 P.M. to 8:00 A.M.) The use of two energy blocks and the ability to only redeem credits based on the block it was produced is a clear attempt to punish solar users by not allowing them to use in the evenings the energy they produce during daylight hours. The time frames suggested for net metering do not match current "time of use" timeframes (7:00 A.M. to 9:00 P.M.) and KY Power proposes to credit solar users for excess generation at the minimum avoided cost rate, regardless of when electricity is produced. Furthermore, if solar created during the "day" time block has a higher avoided cost (because it corresponds with the peak production time) then it should be able to be "redeemed" during the night block when the avoided cost is lower. At the very least the solar time blocks should line up with peak and off-peak demand times and the crediting system should value electricity produced during peak higher, based on a higher avoided cost.

Using an "avoided cost" valuation severely undervalues net metered solar and excludes the many benefits that solar provides to the utility, the grid and our communities. Kentucky Power's requested method does not account for benefits or time of production avoided costs. Of the many benefits that distributed solar provides to both the utilities and ratepayers, it is vital to highlight the overlap between solar peak production and peak energy demand, reduced line loss and wear and tear on the grid, avoided expenditures on pollution controls, and community health and environmental benefits. Simply using the avoided-cost rate does not account for these obvious benefits. I would urge the PSC to pay special attention to the quantifiable health benefits from the EPA's "2019 Public Health Benefits per kWh of Energy Efficiency and Renewable Energy in the United States" technical report and point to the processes developed by other states which have successfully included solar benefits in their value of solar analysis. I support the creation of a process that considers both costs and benefits of net metered solar as per the PSC's order following the administrative hearing in the Fall of 2019.

Solar is helping low- and moderate income people, businesses and organizations by helping to lower their utility bills. If the PSC and KY Power are genuinely concerned with solar being

accessible for low-income citizens, then it is vital that the existing 1:1 net metering be preserved. Without net metering, investing in solar would be out of reach for most people. Instead of changing our 1:1 net metering rate, we need policies which help make solar even more accessible. For example, third-party ownership, virtual net metering, net metering credit transfer, expansion of energy efficiency programs, stable fixed cost rates and on-bill financing.

Beyond the impacts to solar users, I am troubled that Kentucky Power's rate case is another attempt to raise rates for Kentuckians already struggling to pay their bills and to discourage energy efficiency. Raising the mandatory, flat fees is a regressive measure that disproportionately harms low-income households and creates a perverse incentive against energy-efficiency investments and/or that raising rates during a pandemic is unconscionable.

This rate case should be rejected because it disincentivizes both solar and energy efficiency, two of the tools that ratepayers can use to take their electricity bills into their own hands and lower their monthly payments. The implementation of a declining block rate structure encourages more electricity use rather than helping people pay their bills. Ultimately, the current utility model is at odds with our ability to help the public keep the lights on by offering huge rates of return for utility investments and coupling energy use with utility profit. We need a new model, not continually higher rates.

Thanks for doing the right thing to protect the public.

Sincerely,
Dr. Justin Mog


800 Goullon Ct. Louisville, KY 40204-2009

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Comments rate case 2020-00174
Date: Tuesday, November 17, 2020 8:27:00 AM
Attachments: [Comments PSC November 2020-00174.pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Kris ODaniel <[REDACTED]>
Sent: Sunday, November 15, 2020 12:29 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Cc: rateintervention <rateintervention@ky.gov>
Subject: Comments rate case 2020-00174

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

Dear Public Service Commission,

I built my farmhouse five years ago. I added solar panels as this is a farm using straight sustainable methods.

I was well aware it was an investment that would not add value to my house. But I wanted to do what I found to be the better choice for the state of Kentucky that emits twice as much CO2 than the average US.

Over the past 24 years, I have firsthand seen the effect of climate change on the farm. Changing weather patterns and seasons taking a toll on nature and animals.

Until the state develops responsible policies and mandates our utilities to get on the right track, incorporating renewables and storage, net-metering fulfills a most important purpose and needs to stay as it is.

Among others, my comments include details of EPA's Estimated Public Health Benefits per kilowatt-hour (BPK) based on avoided emissions from renewables.

Thank you for your considerations

Kris O'Daniel

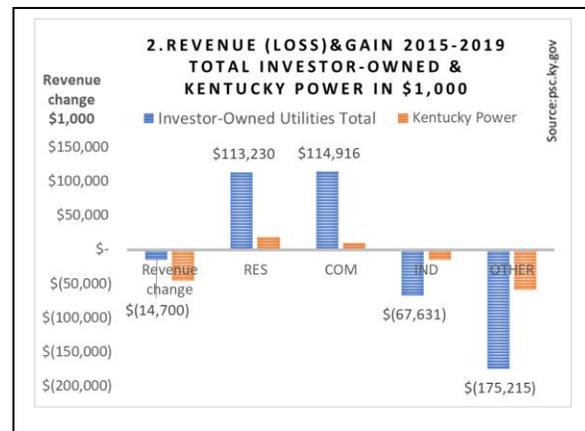
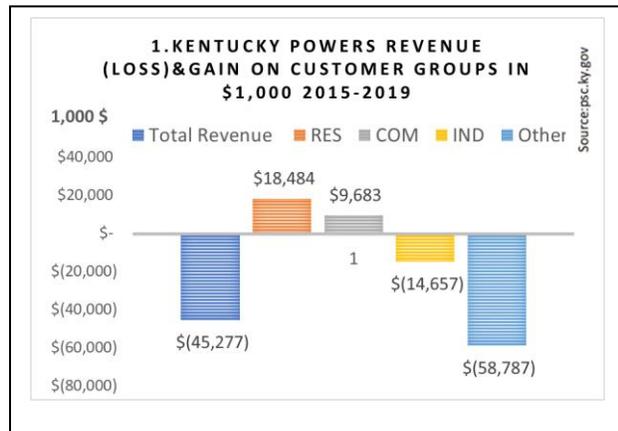
Kirsten P O'Daniel - The Elm House - 647 Beechland Road – Springfield - KY 40069 – USA -

[REDACTED]

Dear PSC,

Kentucky's traditional method of producing energy has come to a crossroads. Kentucky Power Corporation (KPC) is an excellent example of how a business with a narrow focus on shareholder value before ratepayers is the focus of a blind man.

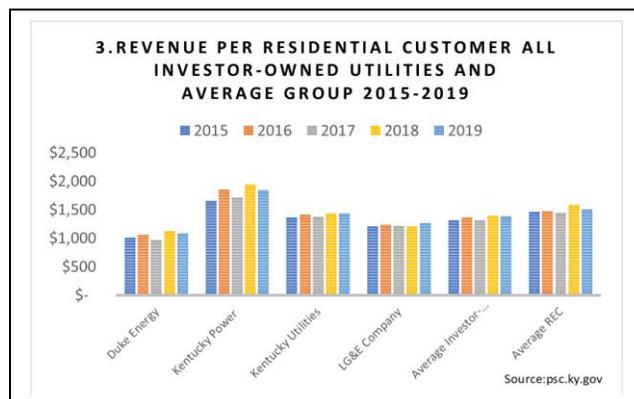
KPC has lost sales over the past five years (2015-2019) to customers like PJM, smaller cities, and industries worth \$73 million. Compared to other investor-owned utilities, KPC's total revenue loss over the five years was \$45 million or about three times as much as the total revenue loss in this group.



Source: psc.ky.gov/utility_financial_reports_NET/stats/100_332.pdf to 336.pdf

KPC's rates to residential and commercial customers have kept increasing. KPC enjoys the highest revenue per customer among the investor-owned utilities and is one of four utilities with the highest rates in Kentucky. (The other are Grayson and Meade RECs and the Kenergy group). But KPC wants even higher rates to accommodate shareholders' demand to reach ROE of 10%. It seems that KPC's business model is an upside-down model to rescue the failed business against the customers they have not lost.

Unfortunately for KPC's residential and commercial customers, they don't have a choice and must endure increasing rates and some of the highest amount of power outages. How can this be fair, just, and reasonable?



Source: psc.ky.gov/utility_financial_reports_NET/stats/200_332.pdf to 336.pdf

It does not come as a surprise that KPC is spending over \$21 million a year on vegetation management of their 10,000 miles long power lines. That to transmit power from coal and natural gas generation in West Virginia and Big River area to Eastern Kentucky's mountains.

KPC's approach is a wasteful business, expensive for KPC's ratepayers, society, and taxpayers.

EPA's estimated public health benefits of renewable energy and energy efficiency

As the PSC is well aware of, the Environmental Protection Agency has developed a set of values for state and local government policymakers to estimate the monetized Public Health Benefits of Energy Efficiency and Renewable Energy as "saved expenses to the Commonwealth" stemming from AVOIDED EMISSIONS. Appendix Example 1 and 2 give more details and the attached files.

According to EPA's Benefits Per Kilowatt-hour (BKP) from solar, the estimated annual health benefits from roof-top solar of a 10kW capacity roof-top solar home is \$250-500 in the central part of Kentucky, but twice that level in Eastern Kentucky \$500-1,000. Likewise, for a 10 MW solar facility, health benefits are estimated to \$500,000 to \$1 million in Eastern Kentucky.

According to the US EIA, Kentucky's EE programs in 2017 resulted in energy savings of approximately 341 million kWh, and in 2018 only 212 million kWh. Following EPA's BKP values for Uniform Energy Efficiency, the estimated health benefits of the energy savings in 2017 was \$9-18 million, covering 25-65% of the \$31.5 million of KY's incremental cost of EE programs in 2017. In 2018 KY's only spend \$17.1 million on EE programs, and the estimated health benefits of the energy savings in 2018 only come to \$6 to 12 million. It should be noted that Kentucky spends much less than most states on EE programs.

Renewables and Energy Efficiency programs save society a lot of money

Shareholders benefits from LIHEAP pay-out to KPC customers – subsidized by taxpayers

A significant proportion of Eastern Kentucky customers qualify for LIHEAP, a federally funded "Low-Income Home Energy Assistance Program." It seems a contradiction that a company that contends "net-metering" is a cost to taxpayers and ratepayers directly plans on and depends on taxpayers' funding for their ratepayers to be able to pay their monthly electricity bills.

Here's LIHEAP data for 9 of the 20 counties KPC serve provided by the Office of the Ombudsman.

KPC receives a significant portion of the \$4.5 million.

Taxpayers are subsidizing KPC.

Fiscal Year 18-19				
County	DistinctHhlds	TotalBenefitsApproved	NumApps	
Boyd	1,010	\$ 234,377.38	1,384	
Breathitt	1,523	\$ 713,102.56	3,427	
Knott	910	\$ 356,552.54	1,902	
Lawrence	1,006	\$ 385,588.04	1,842	
Leslie	1,051	\$ 584,881.42	2,827	
Letcher	1,413	\$ 539,359.81	3,023	
Martin	710	\$ 226,851.04	1,185	
Perry	1,552	\$ 613,654.30	3,062	
Pike	2,562	\$ 794,973.74	4,244	
Total	11,730	\$ 4,449,340.83	22,896	

Source: Citizens Assistance Specialist II, Complaint Review Branch, Office of the Ombudsman, Cabinet for Health and Family Services

Solar facilities plus storage, community solar, and roof-top solar is the best investment

KPC's more prosperous option for shareholders and ratepayers would be to invest in renewables and generate power close to where it's needed, thereby eliminating excessive spending on maintaining power lines in increasingly extreme conditions. Investors are looking to invest in "renewables," not fossil-fuel derived energy.

The sooner KPC starts this transition to invest in solar facilities plus storage and encourage community solar and roof-top solar, the better for shareholders, ratepayers, and taxpayers. Taking this action is the only investment that'll pay off in the long run. Eastern Kentucky is the perfect place to start.

KPC should encourage roof-top solar, not eliminate it. Net-metering benefits KPC at this stage as all local electric generation will aid the necessary transition over the next ten years.

No doubt, KPC expects that the PSC is bailing them out and allows them to punish the ratepayers they still serve to make up for the lost ground they can't recover. From a business point of view, the wrong investment.

With much appreciation for your considerations,

Kris O'Daniel

<file:///C:/Users/kriso/OneDrive/Documents/Energy-Environment/DOLLAR%20VALUE%20of%20SOLAR%20BPK.pdf>

Investor-owned utility stats 2015-2019

http://psc.ky.gov/utility_financial_reports_NET/stats/100_332.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/100_333.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/100_334.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/100_335.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/100_336.pdf

REC stats 2015-2019

http://psc.ky.gov/utility_financial_reports_NET/stats/200_332.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/200_333.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/200_334.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/200_335.pdf

http://psc.ky.gov/utility_financial_reports_NET/stats/200_336.pdf

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case_2020-00174
Date: Wednesday, November 18, 2020 8:31:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Margaret Stewart [REDACTED] >
Sent: Monday, November 16, 2020 7:31 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case_2020-00174

To Members of the PSC:

What is needed now more than ever are ways to **encourage** more energy efficiency measures and more rooftop solar installations, plus facilitate lower, not higher, customer rates. Please, help all in our state **forward** into a new energy future, rather than remain stuck in backward policies and regulations.

Thank you for your careful consideration of all the implications of this proposal.

Sincerely,

Margaret Stewart
2110 Lauderdale Road
Louisville Ky 40205

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Proposed Rate Increase for Eastern Kentucky
Date: Tuesday, November 17, 2020 8:26:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: Mary Tackett [REDACTED]
Sent: Sunday, November 15, 2020 7:39 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Proposed Rate Increase for Eastern Kentucky

Before a proposed rate increase is considered, could the Public Service Commission (PSC) review current standard charges on the bills. In the past, we were informed these would be obsolete once certain expenditures had been paid for in the future. However, the same standard charges are occurring. Some of the charges were apparently in connection with the destruction of a coal fired plant.

In addition, please explain why Kentucky's coal fired plants were eliminated, but we are supposedly having to purchase energy from other States whom still have energy generated by coal fired plants.

In addition, who receives a salary or bonus payments associated with KY Power and what are the cost of yearly salaries and bonuses?

Sent from my iPhone

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: case number 2020-00174
Date: Thursday, November 19, 2020 3:23:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Megan N. Naseman [REDACTED]
Sent: Wednesday, November 18, 2020 7:32 PM
To: PSC Meeting [REDACTED]
Subject: case number 2020-00174

Hello,

While I don't have AEP or KY Power as my electricity provider, I am still concerned about the precedent their proposed rate change would set. As a reminder, policies that make solar make less economic sense just externalize costs onto other sectors. I'm a severe asthmatic and my health insurance company paid out \$28,000 in claims last year. People like me who are more sensitive to air pollution will pay the price if you decide to undermine solar in Kentucky. We need to be moving towards more positive incentives for cleaner, healthier energy.

Also, there should not be a rate hike in a pandemic when so many families are already struggling to pay their bills and keep the lights on.

Sincerely,
Megan Naseman

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: No to raising rates
Date: Thursday, November 19, 2020 3:23:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Michelle Pratt [REDACTED]
Sent: Tuesday, November 10, 2020 9:08 PM
To: PSC Meeting [REDACTED]
Subject: No to raising rates

I Scotty Pratt say NO to raising rates on power bills. Cause, I barely get by on a once a month disability check. If any thing should happen they need to lower rates. Thank u

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case #2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Monique Tilford [REDACTED]
Sent: Wednesday, November 18, 2020 3:39 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case #2020-00174

I was discouraged to hear that Kentucky Power Company (KPC) recently filed to raise its meter and usage rates on residential customers by 25%. I find it unconscionable that they would proceed with this request as we head into what is almost certainly going to be the worst part of this global pandemic.

I ask the PSC to require KPC to do a cost-of-service study. It seems to me that your agency should require KPC to prove its claims against net metering before approving rate changes. I am particularly concerned about rate changes that harm low-income households and discourage homeowners from making energy-efficiency improvements, and hope the PSC is too.

Please do everything you can to ensure that public interests win out against what appears to be excessive private greed.

Sincerely,

Monique Tilford

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: case number 2020-00174
Date: Tuesday, November 17, 2020 8:29:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Natalie Starck <[REDACTED]>
Sent: Monday, November 16, 2020 6:05 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Cc: rateintervention <rateintervention@ky.gov>
Subject: case number 2020-00174

Dear Kentucky Public Service Commission,

Now is not the time for Kentucky Power to raise rates for Eastern Kentuckians and devalue solar/renewable energy investment. I don't want those who are already struggling or have the potential to struggle, to have a harder time paying their bills. Now is especially not the time with the current pandemic going on. Customers don't need an additional worry on top of the already stressful situation we are in with the pandemic. Individuals are losing their jobs, worried about losing their jobs, having to balance work and home life often in the same place, and concerned about contracting a deadly disease known as COVID-19.

Kentucky Power does not need to raise their rates in a time when there are many more things that need to be prioritized like Kentuckians' physical and mental health. However, I do agree with having options such as bill forgiveness and would like to see a continued moratorium on disconnections through the remainder of the pandemic. No one deserves to be disconnected especially now when it is significantly harder to pay bills during the pandemic.

I want individuals to have easy access to solar and other renewable energy options and not

be disincentivized to invest in it.

We do not need a precedent set that will negatively impact the rest of the state and an individual's opportunity to invest in solar energy. I, myself, am not in the service territory of KY Power, though I would like an individual's opportunity to invest in solar energy across the state to remain open and accessible. We need as many accessible options as possible to benefit not only the customer, but also our planet.

Changes should not be made to the solar net metering rates especially now during the pandemic when customers are saving money through this opportunity. Changes to the rate should follow a detailed process that makes sure the costs and benefits of net metered solar are evaluated fairly. It should not be left up to the utility company themselves to decide what the true value of solar net metering on the grid is, but rather involve outside experts, like the net metering consultant the PSC is in the process of hiring, who can give an honest and objective opinion.

The one-to-one solar net metering rate is simple to understand and easy to administer. There is no need to change the rate especially now when KY Power's net metered solar customer base is so small and includes 44 customers. KY Power's proposal includes strict timeframes of when net metering credits can be utilized that further complicates the process, largely benefiting the utility company over the customer. In addition, there are claims that cost-shifting is occurring among net metered solar customers to non-net metered, when in fact there is no proof of that. The KY PSC should follow in the steps of the Arkansas PSC and keep the net metering policy in place until valuable and factual data comes forth indicating that it should be changed.

Why would we want to make it harder for customers and the surrounding communities to benefit from solar energy when we know that renewable energy is a step in the right direction as an alternative to our reliance on fossil fuels?

Lastly, I oppose the universal implementation of smart meters if they are being used as a way to raise rates in the future and further devalue rooftop solar energy. The KY PSC has found smart meters to be of dubious value to customers in the past, so why implement them now without proper explanation as to what their true value to customers is? Customers should have the choice as to whether they would like smart meters and should truly benefit from its implementation rather than largely benefiting the utility.

Please consider the above mentioned remarks as to why raising rates and devaluing solar/renewable energy investment is not the answer, especially now during the pandemic. We do not need to raise rates for Kentuckians already struggling to pay their bills and discourage energy efficiency.

Thank you,

Natalie Starck

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: 8 remaining public comments from KFTC email form, for case 2020-00174
Date: Tuesday, November 17, 2020 8:33:00 AM
Attachments: [Oct 30 2020 public comments - KPC.pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: PSC Public Information Officer <PSC.Info@ky.gov>
Sent: Monday, November 16, 2020 7:25 PM
To: PSC Executive Director <PSCED@ky.gov>
Subject: FW: 8 remaining public comments from KFTC email form, for case 2020-00174

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

From: Nikita Perumal <[REDACTED]>
Sent: Monday, November 16, 2020 10:10 AM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: 8 remaining public comments from KFTC email form, for case 2020-00174

****CAUTION** PDF attachments may contain links to malicious sites. Please contact the COT Service Desk ServiceCorrespondence@ky.gov for any assistance.**

Hi Karen,

Sorry for the delay in getting you the final public comments (just 8) that were submitted on 10/30, the day before we closed our online form. Please take a look (available in both PDF and

Word format) and add them to the case filing when you have a chance!

Best,
Nikita

--

Nikita Perumal
New Energy and Transition Organizer
Kentuckians For The Commonwealth

([REDACTED] [REDACTED]

she/her

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

Dear Kentucky Public Service Commission,

I am writing to express my thoughts as a ratepayer on the proposed rate change Kentucky Power has recently brought before the Commission, in case no. 2020-00174. I have four main points.

1. Kentucky Power's net metering proposal punishes prospective rooftop solar customers. The 'netting periods' Kentucky Power has proposed are arbitrary and seem designed specifically to give rooftop solar customer generators the worst deal. Any net metering rate for grid-tied solar customers must be grounded in a careful evaluation of the costs AND the benefits that rooftop solar brings to the utility. Kentucky Power's proposal does the opposite.

2. By increasing both the fixed charge and the energy charge of residential bills by 25%, Kentucky Power would be imposing a huge financial impact on eastern Kentucky households already struggling to make end's meet, in the middle of a pandemic. Although their offer of bill forgiveness on accounts more than 30 days late on May 28 is a step in the right direction, the actual rates that Kentucky Power has proposed are neither just, nor fair, to ratepayers like me.

I live in Louisa, KY, which is a very rural community. I am on a fixed income. This rate increase affects me and my neighbors greatly, as most of us live here are on a fixed income. I have seen in the newspapers all the time where Kentucky Power is constantly giving money to this and that charity, community organization, etc.

Kentucky Power can take all of this money and fund their own increase that they so badly need. I know that KY Power employees make really high paying salaries-- more than anyone else in our community. KY Power could reduce their employees' salaries, like all of the universities have had to do because of the Covid, and support their rate increases.

KY Power never helps people who are on the very low end of the middle income scale. Those people who had to work hard for a living, for their families, etc. and need a break on their electric bills, too. KY Power never thinks of those people like me. I am above the poverty level in income, yet I still struggle to provide for my family and paying my bills, especially with high-mounting medical bills because of my poor health. People here where I live are usually in bad health, on fixed incomes,

etc. and simply do not have the money to provide for KY Power to pay their employees extremely high salaries, give money away to organizations, charities, etc. that have nothing to do with helping ANYONE (low income or not) who needs help with paying their electric bills. KY Power should try to live on my income and see how far they get (or any of their employees).

3. I strongly oppose the declining block rate, as it disincentivizes energy efficiency, and punishes low-energy households. Only customers who use a lot of electricity in the winter will be better off under the declining block rate - and just for those three months. But customers who have invested in efficiency, have small homes, or try to conserve energy, will be worse off. And the other 9 months out of the year, all of us will pay more, no matter what. Kentucky Power claims to be helping out low-income customers with their proposed declining block rate-but the best way to help us out would be to not increase our rates at all.

4. Kentucky Power has not adequately proved that their plan to universally deploy advanced metering infrastructure is of sufficient value to residential ratepayers to warrant the \$36 million investment. I oppose the universal implementation of smart meters, particularly if they would be used as an excuse to rack up Kentucky Power's profits and further devalue rooftop solar energy in the future.

Please use your regulatory authority to reign in Kentucky Power's rate proposal, which would hurt ratepayers like me in the middle of a global pandemic.

Thank you for your consideration.

Sincerely,

DONNA GEORGE

65 E Clayton Ln
Louisa, KY
41230-6047

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

Dear Kentucky Public Service Commission,

I am writing to express my thoughts as a ratepayer on the proposed rate change Kentucky Power has recently brought before the Commission, in case no. 2020-00174. I have four main points.

1. Kentucky Power's net metering proposal punishes prospective rooftop solar customers. The 'netting periods' Kentucky Power has proposed are arbitrary and seem designed specifically to give rooftop solar customer generators the worst deal. Any net metering rate for grid-tied solar customers must be grounded in a careful evaluation of the costs AND the benefits that rooftop solar brings to the utility. Kentucky Power's proposal does the opposite.

2. By increasing both the fixed charge and the energy charge of residential bills by 25%, Kentucky Power would be imposing a huge financial impact on eastern Kentucky households already struggling to make ends meet, in the middle of a pandemic. Although their offer of bill forgiveness on accounts more than 30 days late on May 28 is a step in the right direction, the actual rates that Kentucky Power has proposed are neither just, nor fair, to ratepayers like me.

3. I strongly oppose the declining block rate, as it disincentivizes energy efficiency, and punishes low-energy households. Only customers who use a lot of electricity in the winter will be better off under the declining block rate - and just for those three months. But customers who have invested in efficiency, have small homes, or try to conserve energy, will be worse off. And the other 9 months out of the year, all of us will pay more, no matter what. Kentucky Power claims to be helping out low-income customers with their proposed declining block rate-but the best way to help us out would be to not increase our rates at all.

4. Kentucky Power has not adequately proved that their plan to universally deploy advanced metering infrastructure is of sufficient value to residential ratepayers to warrant the \$36 million investment. I oppose the universal implementation of smart meters, particularly if they would be used as an excuse to rack up Kentucky Power's profits and further devalue rooftop solar energy in the future.

Please use your regulatory authority to reign in Kentucky Power's rate proposal, which would hurt ratepayers like me in the middle of a global pandemic.

Thank you for your consideration.

Sincerely,

Sally Cole

834 Long Branch Rd
Salyersville, KY
41465-8312

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

Dear Kentucky Public Service Commission,

I am writing to express my thoughts as a ratepayer on the proposed rate change Kentucky Power has recently brought before the Commission, in case no. 2020-00174. I have four main points.

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Please use your regulatory authority to reign in Kentucky Power's rate proposal, which would hurt ratepayers like me in the middle of a global pandemic.

Thank you for your consideration.

Sincerely,

Linda Little

91 Masons Ln
East Point, KY
41216-9025

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

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I am writing to express my thoughts as a ratepayer on the proposed rate change Kentucky Power has recently brought before the Commission, in case no. 2020-00174. I have four main points.

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Please use your regulatory authority to reign in Kentucky Power's rate proposal, which would hurt ratepayers like me in the middle of a global pandemic.

Thank you for your consideration.

Sincerely,

Barbara Harper

460 Poplar Hollow Rd
Morehead, KY
40351-7059

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

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Please use your regulatory authority to reign in Kentucky Power's rate proposal, which would hurt ratepayers like me in the middle of a global pandemic.

Thank you for your consideration.

Sincerely,

VICKIE SHELTON

953 Prospect Ave
Ashland, KY
41101-2749

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

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Thank you for your consideration.

Sincerely,

Teresa Weikle

6810 US Highway 60 W
Morehead, KY
40351-8756

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

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Please use your regulatory authority to reign in Kentucky Power's rate proposal, which would hurt ratepayers like me in the middle of a global pandemic.

Thank you for your consideration.

Sincerely,

Joy Lucas

1630 Center St
Catlettsburg, KY
41129-1334

FROM: [REDACTED]

TO: PSC Public Information Officer <PSC.info@ky.gov>

SUBJECT: Comments on PSC Case Number 2020-00174

2020-10-30

Dear Kentucky Public Service Commission,

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Thank you for your consideration.

Sincerely,

Jay Webb

3137 Cannonsburg Rd
Catlettsburg, KY
41129-8211

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case_2020-00174
Date: Tuesday, November 17, 2020 8:29:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Nina McCoy [REDACTED]
Sent: Monday, November 16, 2020 6:01 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case_2020-00174

My name is Nina McCoy and I am a resident of Inez, KY in Martin County. I have sent the following message as an open letter to the Lexington Herald Leader but I also wanted to submit it for the record in the above case.

I would like to publicly address the rate increase case currently before the Kentucky Public Service Commission (case 2020-00174). It is of grave importance for everyone to consider the players involved as well as the timing.

First and foremost, the rate increase requested by Kentucky Power during this unprecedented period of COVID-19 and current depressed state of eastern Kentucky is extremely insensitive.

Mostly I want to emphasize how this request displays the most important dilemma facing our society: unbridled waste in deference to corporate profits. The proposed declining block rate unfairly punishes the poorest customers, burdening them with higher fee rates in

proportion to their income. It also disincentivizes energy savings.

When I started teaching high school biology in 1983, I accepted the idea that if we explained the importance of conservation to the young people, they would change the world.

A young lady in my “Environmental Issues” class emotionally demonstrated the cruelty of this idea. At first, she seemed very disinterested in the articles and videos I brought in to expose the problems of waste. Then one day, after watching Disney’s *WALL-E*, she broke down, putting her hands over her ears, and on the verge of tears, cried, “Oh, Ms. McCoy, I just can’t take it anymore. This scares me and I don’t want to hear it anymore.”

I decided then and there that it is adults who need to be forced to address the issue of our wasteful society. Think about the barbarity of saddling our children with the responsibility of fixing what we refuse to face while we continue to exacerbate the very problem we are demanding they address... later, of course.

After retiring in 2015, I accompanied fellow members of Kentuckians for the Commonwealth in speaking to Kentucky legislators about net metering legislation. I was excited about the possibility of getting our new high school in Martin County to be the first “net zero” high school in the United States. I knew that Rep. DeCesare from Bowling Green was very proud of his region’s net zero middle school.

DeCesare and another representative told us separately that they had actually hoped to go solar at home, but that after looking at the cost, it just “wasn’t really worth it.”

Both of these very powerful men were in an income bracket to be able to afford these energy-saving measures; and they, unlike my high school students, were in a position to make it more accessible to the average person by promoting legislation that could make conservation more attractive. They were adamant that they would never support any initiative that looked like a “mandate.”

Consider all the players and the situation. Here we sit in the heart of the richest, most powerful nation in the history of the world as we face a universal crisis caused by our own unwillingness to conserve resources.

Like many of my former students, the young lady from my class is now a busy professional working hard every day and raising a young family. She doesn’t have the time or the wherewithal to even begin to approach the monumental problem of resource waste.

The leaders of our democracy admit their unwillingness to address the issue in any substantive way.

Our “capitalist” leaders, such as Kentucky Power, are compelled to use their monopolized power to increase their bottom dollar, keeping solar and conservation just out of reach for most of us.

Which leads to the unique position of the PSC: You could allow the rate increase to assure an easy profit margin for this essential utility at a time when many of their customers are unsure when they will get another paycheck. Or you could point Kentucky Power’s engineers and accountants back to the drawing board to figure out a way to make renewable energy affordable, taking the first step in removing the burden off the next generation.

Nina McCoy
P.O. Box 922
Inez, KY 41224



Sent from [Outlook](#)

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Patsie Peak [REDACTED]
Sent: Wednesday, November 18, 2020 7:39 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

With all the storms and fires our country is experiencing, we need all the solar power we can get!

Raising mandatory flat fees creates a perverse incentive against energy efficient investments.

Raising rates during a pandemic is unconscionable!

At the very least you should require KPC to do a cost-of-service study to prove its claims against net metering before approving rate changes.

Thank you for reading my email, Patsie Peak

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case No. 2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Patsy Stallard [REDACTED]
Sent: Monday, November 16, 2020 3:44 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case No. 2020-00174

Sir,

I am writing to request that the Public Service Commission deny the Kentucky Power Company's request for changes to Net Metering.

Since graduation from the University of Kentucky School of Law, I have practiced for 43 years as an attorney in Eastern Kentucky. I have served as a Board Member for HOMES, Inc., a non-profit organization, which provides affordable housing for Letcher and surrounding counties for the past six years. I am also a Board Member of Meridzo Center which provides economic assistance and planning in the Tri-city area of Harlan, Kentucky. In those capacities, I have become familiar with the burgeoning Solar Power industry throughout Eastern Kentucky and the benefit that it has provided not only to the recipients of the installation of solar panels but also the individuals who are now employed in the installation. Our community is struggling in the aftermath of the coal industry's decline. In the midst of our significant un-employment and the effects of the COVID-19 Pandemic, now is not the time to introduce changes that will substantially destroy the installation of rooftop solar in our area. The loss of this benefit to businesses in our community will certainly result in a loss of

services and employment at the worst possible time. Therefore, this is to request that the Kentucky Power Company's request for changes in Net Metering be denied.

Gene Smallwood, Jr.

Patsy L. Stallard

Legal Administrative Assistant

Step toe & Johnson PLLC

127 Main Street, Suite C

Whitesburg, Kentucky 41858

O: [REDACTED] F: [REDACTED]

Assistant to Gene Smallwood, Jr.

Nathaniel R. Kissel

[REDACTED]

www.step toe-johnson.com



Step toe & Johnson PLLC Note:

This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you for your cooperation.

From: Bruner, Brandon S (PSC) on behalf of PSC Executive Director
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Monday, November 23, 2020 10:21:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Roxanne Sturtevant [REDACTED]
Sent: Thursday, November 19, 2020 8:10 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

Rooftop solar purchased and installed by individual customers supports Ky jobs and helps to save our environment. KPC must do the usual routine cost of service study to justify its claims concerning the added cost of net metering. Raising rates and flat fees disincentivizes the needed investment in solar power, keeping KY in the dark, polluting age of fossil fuel use. It is backward thinking at a time when our state needs clean energy solutions and frankly a better reputation in our country.

Mary R Sturtevant, Louisville, KY

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case number 2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

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Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Osborn, Scott [REDACTED]
Sent: Monday, November 16, 2020 2:13 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case number 2020-00174
Importance: High

To Whom It May Concern:

My name is Scott Osborn, and I live in Louisa, Kentucky. I am a Marine Corps veteran, I work in the local school system, and I have a family. I am writing this to express my shock and extreme dissatisfaction with the imposed Kentucky Power rate increases.

In this regulatory and taxation environment, which is so favorable to utility companies, I do not understand any possible rationale for raising rates yet again (third time in five years). To raise them during this pandemic with its severe economic consequences would be, quite frankly, criminal.

There is no valid reason for imposing these higher rates yet again on customers. None whatsoever.

Sincerely,

Scott Osborn
403 New Circle Street
Louisa, KY 41230

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case #2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Sherry Cornell [REDACTED]
Sent: Wednesday, November 18, 2020 4:10 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case #2020-00174

To Whom It May Concern,

Solar energy is the future. Kentucky needs to be at the front of the fight for energy freedom. This is our chance to be a leader rather than be 47th, 48th or worse in everything! Solar energy should be seen as an opportunity for the commonwealth and its citizens, and as such should be protected rather than undermined.

Please, require Kentucky Power Co. to do a cost of service study to prove its claims against net-metering, before approving rate changes. This should be a minimum requirement. Raising mandatory, flat fees harms low-income households and creates a perverse incentive against energy efficiency investments. Not to mention that raising rates during a pandemic is unconscionable. I am asking you to weigh public interests against private greed.

Sincerely,
Sherry Cornell, President
[Highlands Douglass Neighborhood Association](#)
[REDACTED]

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case_2020-00174
Date: Tuesday, November 17, 2020 8:28:00 AM

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Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Travis Bowling [REDACTED]
Sent: Monday, November 16, 2020 4:12 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case_2020-00174

Please add the comments below to the case.

Hello,

My name is Travis Bowling - husband of an educator, father of two grade schoolers, and an engineering manager for a class 1 railroad. We are from Jackson, KY, moved to Ohio in 2015, and just moved back to Jackson, KY to a home in Kentucky Power's service area.

That service area consists of 20 eastern Kentucky counties almost all of which are considered economically distressed according to studies conducted by the Appalachian Regional Commission. Annual household income is far lower in Eastern Kentucky than the rest of the state and nation. Even working families make much less here.

Full disclosure: Kentucky Power offers two low income assistance programs, and there are other government programs available to those who qualify. Existence of these programs should not weigh on your decision of whether or not to approve this rate increase. Families like mine, who don't qualify for assistance, are made poorer every time a company uses assistance programs to justify price hikes.

According to data from the U.S. Energy Information Administration, Kentucky Power bills

doubled between 2004 and 2016. I took my most recent Kentucky Power bill and divided the total amount due by the usage to get a real rate figure. That figure is 13.7 ¢ per KWH. My last bill in Ohio with Dayton Power and Light calculated to 9.7 ¢ per KWH. My brother's most recent electric bill in Morehead, KY with Fleming-Mason Electric Cooperative calculated to 9.9 ¢ /KWH. In other words, Kentucky Power is already 40% higher than the two other electric companies of which I am familiar.

Kentucky Power gave its employees generous raises in 18' and 19', achieved near 0 effective income tax rate in 2019, and is currently due to receive a 20% tax refund for the first three quarters of 2020. Kentucky Power also benefited \$18 Million dollars from Kentucky State Tax Law changes in 2018.

As you know, Kentucky Power is one of many wholly own subsidiaries of AEP. Kentucky Power customers account for about 4% of AEP's total customer base. AEP is an investor-owned, for-profit utility company.

AEP paid \$1.35 Billion in dividends to stockholders in 2019 – that's Billion with a B. AEP has already paid over \$1 Billion in dividends to stockholders - this "year of the plague" – 2020. AEP has paid dividends for 442 consecutive quarters.

On page 26 of AEP's 4th Quarter 2019 Earnings Release Presentation, AEP published a chart showing how much money each subsidiary company reaped from rate hikes on customers. The total was \$210 million that year. At the bottom it says "Impact on EPS - \$.34". EPS means earnings-per-share. In other words, AEP said: "stockholders here is how much money we put back in your pockets by raising electric rates on our customers." WOW.

In summary, AEP is asking you, the Kentucky Public Service Commission, to authorize a rate hike of 25% on customers in the poorest region of Kentucky. 10 of the 20 counties served by Kentucky Power are on the list of 100 poorest counties in the United States, and have poverty rates as high as three times the national average.

KPCo and AEP are doing great financially according to their own reports to stockholders and have opted to continue dividend payments during the pandemic of 2020. Poor and middle class Eastern Kentucky households already live in economic distress, see more economic pain ahead, and are least capable of dealing with a rate increases.

So, what's the 10 year outlook? If you approve this 25% rate hike, and project a very conservative monthly average usage of 1388 KWH, in 10 years I will have paid Kentucky Power, AEP, and their stockholders over \$12,000 more than my brother in Morehead, KY would for the same amount of electricity. Twelve.Thousand.Dollars.More in the Poorest.Region.of.the.State.

So the 10 year outlook for the Adelynn & Gideon Bowling college fund is most likely \$0. While the outlook for AEP stockholders is over \$13 Billion in dividend payouts alone.

On behalf of Eastern Kentucky – I ask you to say NO to Kentucky Power.

Travis Bowling

3970 Highway 15 S

Jackson, KY 41339

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: Case number 2020-00174 Agenda
Date: Tuesday, November 17, 2020 8:24:00 AM
Attachments: [KPCo Rate Hike Real World Analysis \(002\).pdf](#)

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: Travis Bowling [REDACTED]
Sent: Sunday, November 15, 2020 11:36 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Re: Case number 2020-00174 Agenda

Karen,

Can you provide the attached PowerPoint Presentation to the group of officers hearing the case?

I would like to present this, visually, during my 5 minutes before the group, but I'm not sure if we have video and presenter functionality for the virtual hearing tomorrow. I would like the group to review the presentation, in the event I cannot present visually.

Can you give me a call at 606.272.7337 to discuss this?

Thank you,
Travis Bowling
[REDACTED]
3970 Highway 15 S
Jackson, KY 41339

On Fri, Nov 13, 2020, 2:38 PM PSC Public Information Officer <PSC.Info@ky.gov> wrote:

|

Mr. Bowling,
We will place your name on the list.

Regards,

Karen

Karen L. Wilson, MPA
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601
Office: 502.782.7136
Cell: 502.330.2454

From: Travis Bowling [REDACTED]

Sent: Friday, November 13, 2020 12:16 PM

To: PSC Public Information Officer <PSC.Info@ky.gov>

Subject: Case number 2020-00174 Agenda

Hello,

I would like to be placed on the speaker list for the virtual public hearing session on November 16 6-9 p.m.

I will make the case for customers against the rate increase. I will compare existing rates with Dayton Power and Light rates from my own bills earlier this year, before moving to Eastern Kentucky. I will discuss recent collapse of an already anemic economy in eastern Kentucky due to coal industry collapse. Families are already devastated financially here and adding to the cost of living is just unimaginable. Many people receive assistance with electric bills through government sponsored programs. It is not ethical to use that fact as a leverage to permit the raising rates. If the cost to provide electricity is truly more, today, I will suggest that Kentucky Power do the same thing as Eastern Kentucky families and local businesses devastated by loss of income: Look internally, make significant operational changes to save money within, rather than making life of eastern Kentucky families even harder.

I will gather statistics from corporate earnings reports and other available factual data. I will do this in a calm, rational, way - free of baseless remarks and emotional pleas....

Travis Bowling
3970 Highway 15 S
Jackson, KY 41338



Kentucky Power Rate Hike Request Real World Analysis

By Travis Bowling – KPCo rate payer – Jackson, KY

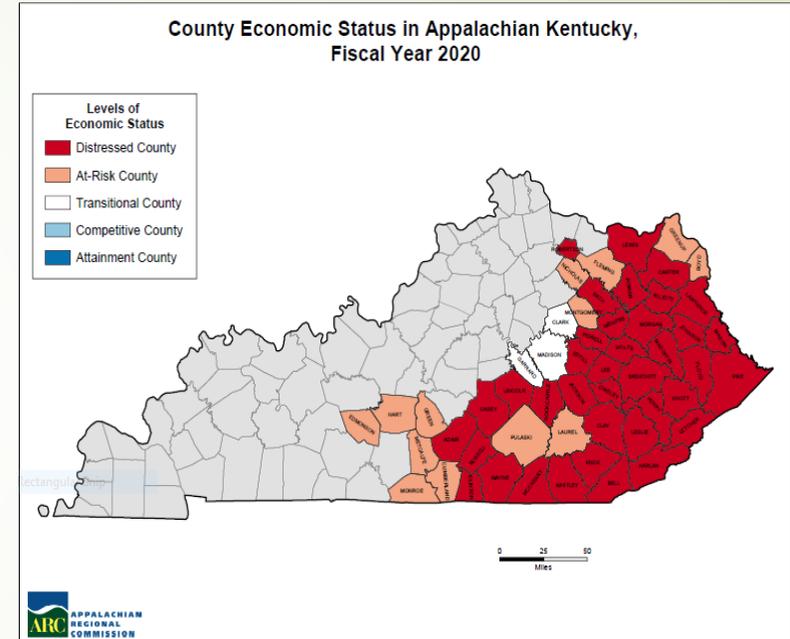


- L to R: Adelynn, Travis, Cora, Gideon.
- Origin: Jackson, KY
- Moved to Ohio: 2015
- Moved to Jackson, KY: 2020
- Travis: Engineering Manager
- Cora: Professional Educator
- Adelynn: 3rd grade star student
- Gideon: 5th grade basketball standout

KPCo Service Area



Economically Distressed Counties



- Source: <https://www.kentuckypower.com/global/utilities/lib/docs/info/facts/factsheets/KYPower-2020FactSheet.pdf>
- Source: Appalachian Regional Commission



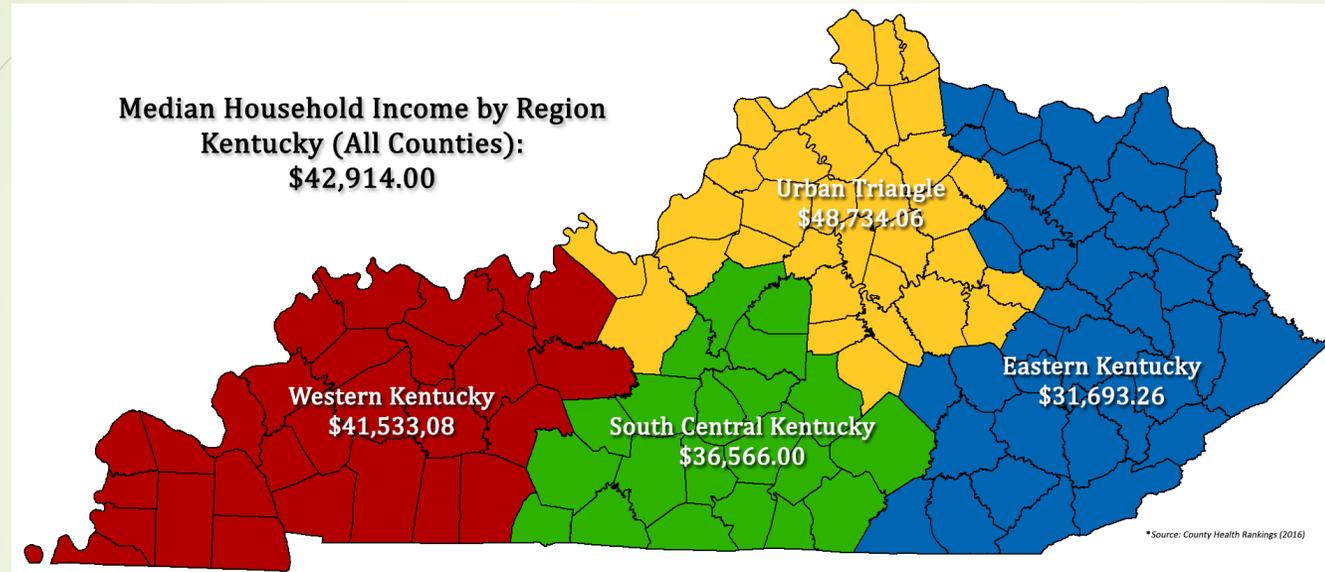
Fair disclosure...

Payment Assistance Programs

Kentucky Power offers two programs to assist low income customers and others in need of help. Federal assistance also is available. Community Action Kentucky and its local community agencies administers the programs and determines who qualifies for assistance.

- ▶ In addition to these two programs there is a federal program called LIHEAP.
- ▶ All of these programs assist low income families afford electric bills.
- ▶ Using the programs as an argument to justify rate hikes is unfair to rate-payers like myself, who struggle to make ends meet without assistance.
- ▶ Many hard working Eastern Kentucky family and retirees' incomes are slightly above the qualification thresholds for these programs.
- ▶ Allowing rates to be raised, using assistance programs as a “feel good” justification further strains families that are working and paying their bills without assistance.
- ▶ This thought process is contributing to the economic strain on working families and the mass exodus of productive families from the high cost of living in eastern Kentucky.

KPCo serves poorest region of KY



- Notice the median income of eastern Kentucky compared to the Urban Triangle.
- Urban Triangle households make 53% more than Eastern Kentucky households.
- Working families in eastern Kentucky make much less than other parts of the state and nation.
 - To raise rates on these folks would be unfair.
- Image source: University of Kentucky Gatton College of Business
<http://cber.uky.edu/social-determinants-health>

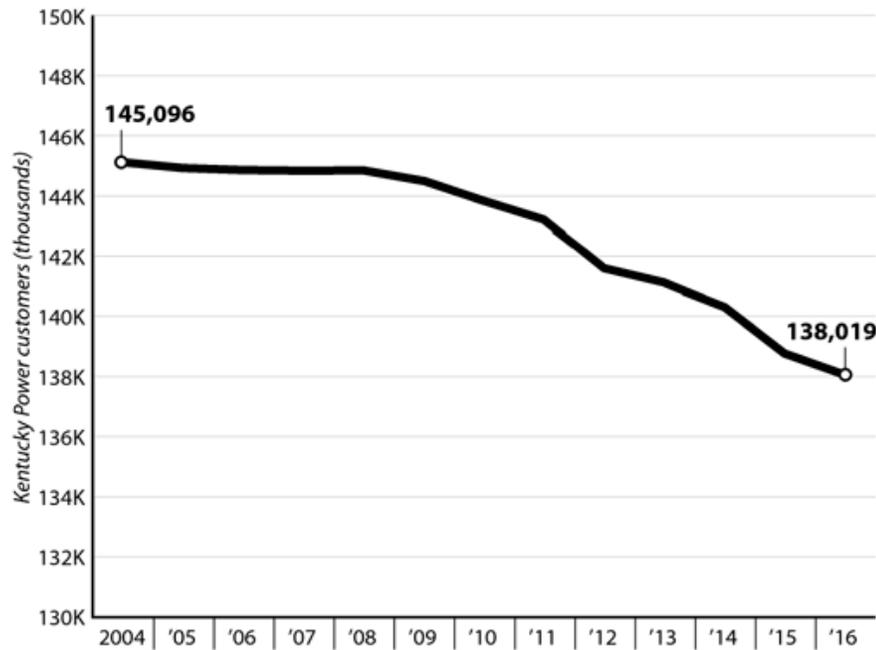
KPCo losing customers and hiking rates.

Are people leaving eastern Kentucky to escape the high cost of living?

Kentucky Power's Losing Residential Customers

As people move out of eastern Kentucky, Kentucky Power's costs are spread among fewer residential customers. That's one of several reasons power costs have risen in the region.

KENTUCKY POWER CUSTOMERS
2004-2016



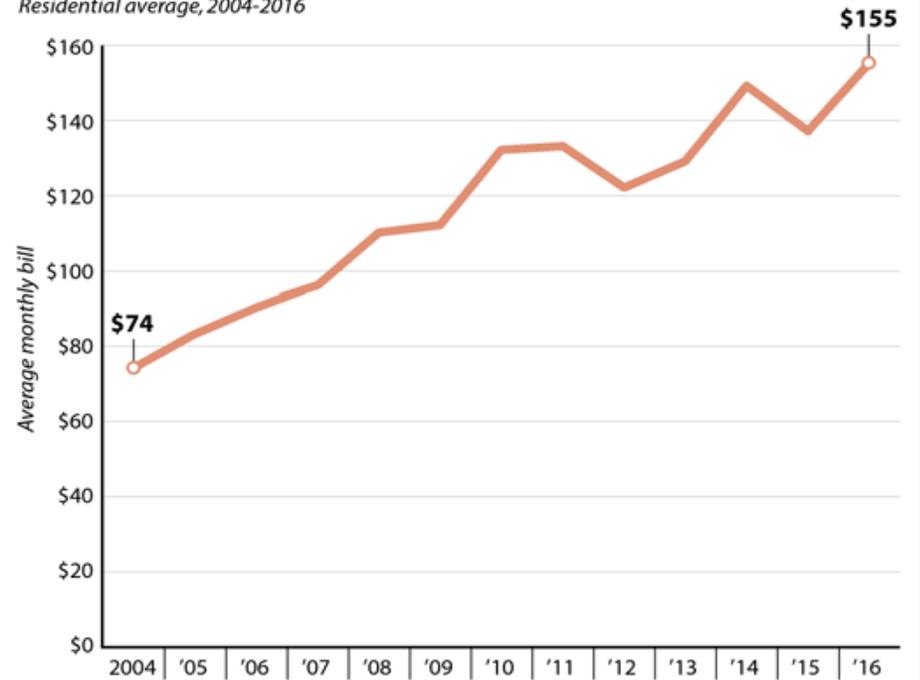
SOURCE: U.S. Energy Information Administration data

PAUL HORN / InsideClimate News

Electricity Bills Skyrocket in Eastern Kentucky

The average monthly electric bill has risen for Kentucky Power's residential customers in recent years. Fewer customers are shouldering the costs of uneconomical coal plants.

KENTUCKY POWER CUSTOMER MONTHLY BILL
Residential average, 2004-2016



SOURCE: U.S. Energy Information Administration data

PAUL HORN / InsideClimate News



Eastern Kentucky Cost of living – a personal account

- ▶ When I moved from Jackson, KY to Monroe, Ohio in 2015 it was a corporate move. Part of the relocation package is cost of living adjustment for 5 years.
- ▶ The cost of living analysis between Jackson, KY and Monroe, Ohio determined that the cost of living was far less in Monroe – a Cincinnati suburb. At the time, *I thought that was absurd.*
- ▶ Here's are a few of the other areas where cost of living is considerably higher in Kentucky:
 - ▶ Payroll taxes (\$100/month more in KY for me)
 - ▶ Auto Insurance: \$800/yr- Ohio , \$2300/yr – Eastern KY.
 - ▶ Homeowners Insurance doubled when moved back to KY.
 - ▶ Groceries much higher in Eastern KY
 - ▶ Annual Auto taxes – KY: \$500 – Ohio: \$0
 - ▶ Generally higher wages in Ohio for the same job.
 - ▶ General lack of jobs in eastern Kentucky.
 - ▶ Several other examples are available, but you get the point.

Actual Bill comparisons between DP&L and KPCo at the time of my relocation, plus my brother's residence in Morehead, KY with Fleming-Mason Energy Cooperative:

KY Power vs Dayton Power & Light vs Fleming Mason Energy Cooperative - residential rates					
	Bill Date	Usage	Total Bill	Total \$/KWH	
KPCo-KY	11/9/2020	733	\$100.75	0.137449	~40% Higher rate already
DP&L-Ohio	8/26/2020	840	\$81.61	0.097155	
FMEC-KY	11/1/2020	924	\$91.70	0.099242	

➤ As you can see, KPCo is already extremely expensive in comparison to DP&L & FMEC.

➤ Source: Actual customer electric bills.

Let's consider the customer income with respect to the KPCo vs DP&L comparison...

Breathitt County, KY	vs	Green County, Ohio
Median household income (in 2018 dollars), 2014-2018	\$26,376	Median household income (in 2018 dollars), 2014-2018 \$67,109
Per capita income in past 12 months (in 2018 dollars), 2014-2018	\$17,729	Per capita income in past 12 months (in 2018 dollars), 2014-2018 \$34,682
Persons in poverty, percent	☐☐ 32.5%	Persons in poverty, percent ☐☐ 11.6%
54 more rows		54 more rows
www.census.gov > quickfacts > breathittcountykentucky		www.census.gov > table > greencountyohio > INC110218

➤ Household income in Green County, Ohio is nearly TRIPLE that of Breathitt County, KY – (and the electric bill is much cheaper....)

➤ * data from my two counties of residence in 2020.



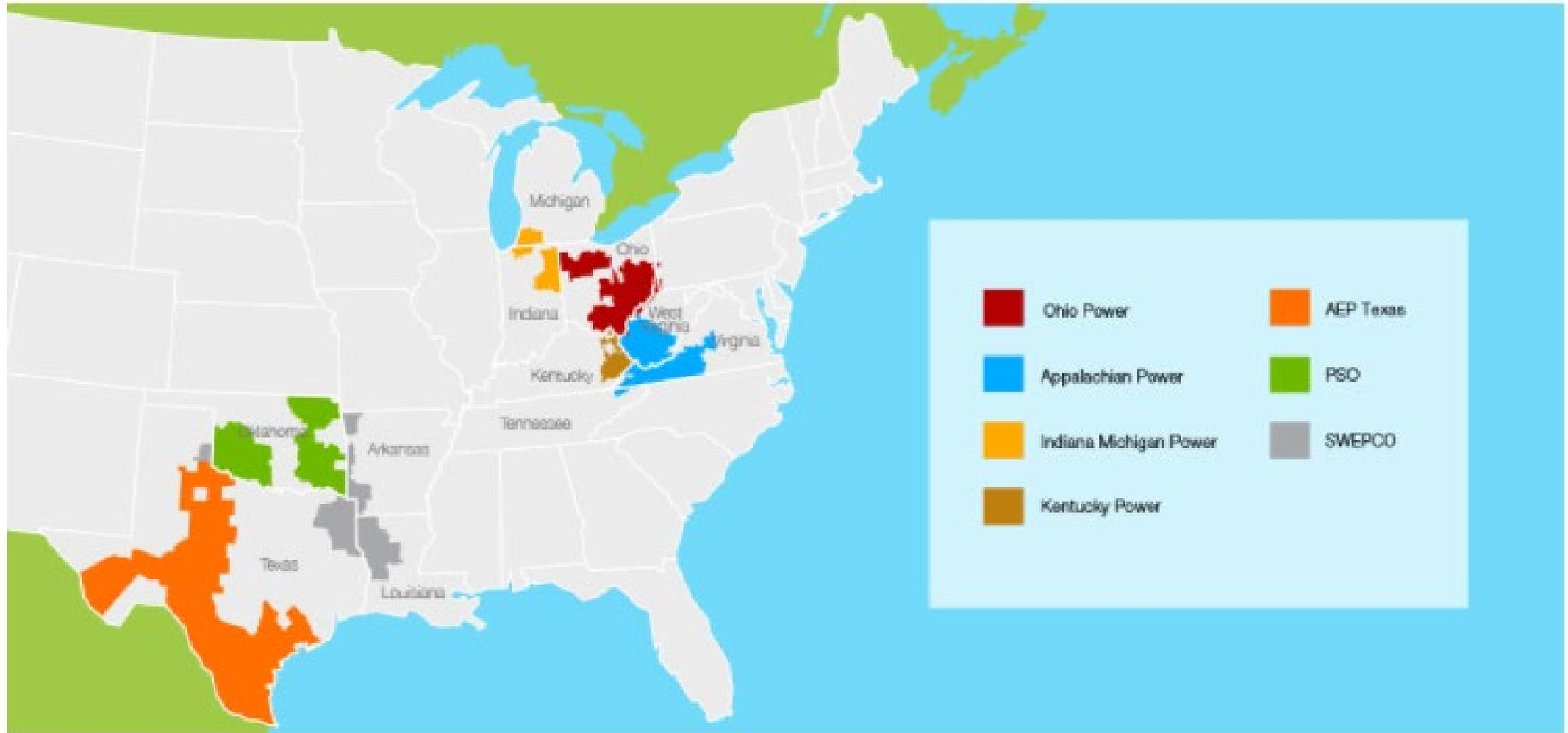
A closer look at Kentucky Power....

- ▶ KPCo is one of many wholly own subsidiaries of American Electric Power (AEP)
- ▶ AEP has over 5 million total customers in 11 states.
- ▶ KPCo has 165,000 customers – about 3% of AEP's total.
- ▶ The common stock of KPCo is wholly-owned by AEP.
- ▶ AEP is a investor-owned, for-profit company.
- ▶ In the slides to follow, notice some slides are specific to KPCo while other slides are specific to the Parent company AEP.

▶ Source: <https://www.kentuckypower.com/info/facts/Facts.aspx>

▶ Source: <https://www.aepnationalaccounts.com/info/facts/ServiceTerritory.aspx>

AEP Service Territories



Source: <https://www.aepnationalaccounts.com/info/facts/ServiceTerritory.aspx>

KPCo has continued to raise base pay of employees 4.5-4.7% per year

Assumptions	Pension Plans		OPEB	
	December 31,			
	2019	2018	2019	2018
Discount Rate	3.25%	4.30%	3.30%	4.30%
Interest Crediting Rate	4.00%	4.00%	NA	NA
Rate of Compensation Increase	4.70% (a)	4.50% (a)	NA	NA

(a) Rates are for base pay only. In addition, an amount is added to reflect target incentive compensation for exempt employees and overtime and incentive pay for nonexempt employees.

- KPCo has continued to give its employees very generous raises.
- Source document: KPCo 2019 Annual Report page 30

KPCo was able to achieve a 2019 Effective income tax rate of near 0

	Years Ended December 31,	
	2019	2018
	(in thousands)	
Net Income	\$ 53,300	\$ 63,146
Income Tax Expense	21	5,999
Pretax Income	\$ 53,321	\$ 69,145
Income Taxes on Pretax Income at Statutory Rate (21%)	\$ 11,197	\$ 14,520
Increase (Decrease) in Income Taxes Resulting from the Following Items:		
Depreciation	1,214	2,600
AFUDC	(258)	(413)
Removal Costs	(1,470)	(1,079)
State and Local Income Taxes, Net	423	884
Tax Reform Excess ADIT Reversal	(10,868)	(10,456)
Other	(217)	(57)
Income Tax Expense	\$ 21	\$ 5,999
Effective Income Tax Rate	— %	8.7 %

Source: KPCo 2019 Annual Report page 49

KPCo amended previous tax returns to achieve a Q3 2020 22.9% tax refund! (20.3% for Q1-Q3)

The ETR for KPCo is included in the following table:

	Three Months Ended September 30,		Nine Months Ended September 30,	
	2020	2019	2020	2019
U.S. Federal Statutory Rate	21.0 %	21.0 %	21.0 %	21.0 %
Increase (decrease) due to:				
State Income Tax, net of Federal Benefit	(5.0)%	(4.5)%	(5.0)%	0.2 %
Tax Reform Excess ADIT Reversal	(30.2)%	(21.0)%	(30.2)%	(14.5)%
Flow Through	0.3 %	5.8 %	0.3 %	(0.5)%
AFUDC Equity	(2.0)%	(0.6)%	(2.0)%	(0.8)%
Parent Company Loss Benefit	— %	2.7 %	— %	— %
Discrete Tax Adjustments	(7.1)%	(0.7)%	(4.4)%	2.0 %
Other	0.1 %	(1.7)%	— %	(0.6)%
Effective Income Tax Rate	(22.9)%	1.0 %	(20.3)%	6.8 %

Federal and State Income Tax Audit Status

KPCo and other AEP subsidiaries are no longer subject to U.S. federal examination by the IRS for all years through 2015. During the third quarter of 2019, AEP and subsidiaries elected to amend the 2014 and 2015 federal returns. In the first quarter of 2020, the IRS notified AEP that it was beginning an examination of these amended returns, including the net operating loss carryback to 2015 that originated in the 2017 return. The IRS may examine only the amended items on the 2014 and 2015 federal returns.

➤ Source: KPCo 2020 3rd Quarter Report page 27

YTD Reconciliation of GAAP to Operating Earnings



	\$ in millions			Earnings Per Share		
	YTD-18	YTD-19	Change	YTD-18	YTD-19	Change
Reported GAAP Earnings	\$1,924	\$1,921	(\$3)	\$3.90	\$3.89	(\$0.01)
Non Operating Items:						
Mark-to-Market Impact of Commodity Hedging Activities ¹	-	6	6	-	0.01	0.01
Severance Charges ²	20	18	(2)	0.04	0.04	-
Impairment of Certain Merchant Generation Assets ¹	37	25	(12)	0.08	0.05	(0.03)
Change in Kentucky State Tax Law ³	(18)	-	18	(0.03)	-	0.03
Acquisition Fees ^{1,3}	-	11	11	-	0.02	0.02
Previously Retired Coal Generation Assets ⁴	-	73	73	-	0.15	0.15
Texas Base Rate Case ⁵	-	41	41	-	0.08	0.08
Effects of Tax Reform ²	(18)	-	18	(0.04)	-	0.04
AEP Operating Earnings	\$1,945	\$2,095	\$150	\$3.95	\$4.24	\$0.29

¹ Items recorded in Generation & Marketing segment

² Items recorded across multiple segments

³ Items recorded in Corporate and Other segment

⁴ Items recorded in Vertically Integrated Utilities segment

⁵ Items recorded in Transmission and Distribution Utilities segment

Weighted average no. of shares outstanding: 493M YTD-18 and 493.7M YTD-19

➤ AEP benefited from Kentucky tax law changes and federal tax reforms to the tune of \$36Million in 2018.

➤ Source: AEP 4th Quarter 2019 Earnings Release Presentation page 16

“Rate Performance”?

- This is a graphic from AEP's 4th Quarter 2019 Earnings Release Presentation. (page 26)
- It shows, to AEP's stockholders, the effect electric rate hikes had on earnings-per-share.
- The hash mark by KPCo denotes no rate changes in 2019. KPCo did get a KY tax law change in 2018.
- It seems unethical, to me, for AEP to publish to investors the impact rate hikes on captive customers had on the their stock earnings-per-share.
 - It's basically saying to Wall Street stock brokers: “Look here how much these rate hikes helped your stock!”

YTD Rate Performance

<i>Vertically Integrated Utilities</i>	
	Rate Changes, net of offsets (\$ in millions)
	YTD-19 vs. YTD-18
APCo/WPCo	\$50
I&M	\$84
KPCo	-
PSO	\$68
SWEPCO	\$6
Kingsport	\$2
TOTAL	\$210
Impact on EPS	 \$0.34

AEP and Effective Tax Rates

Q4-19 Effective Tax Rate Reconciliation

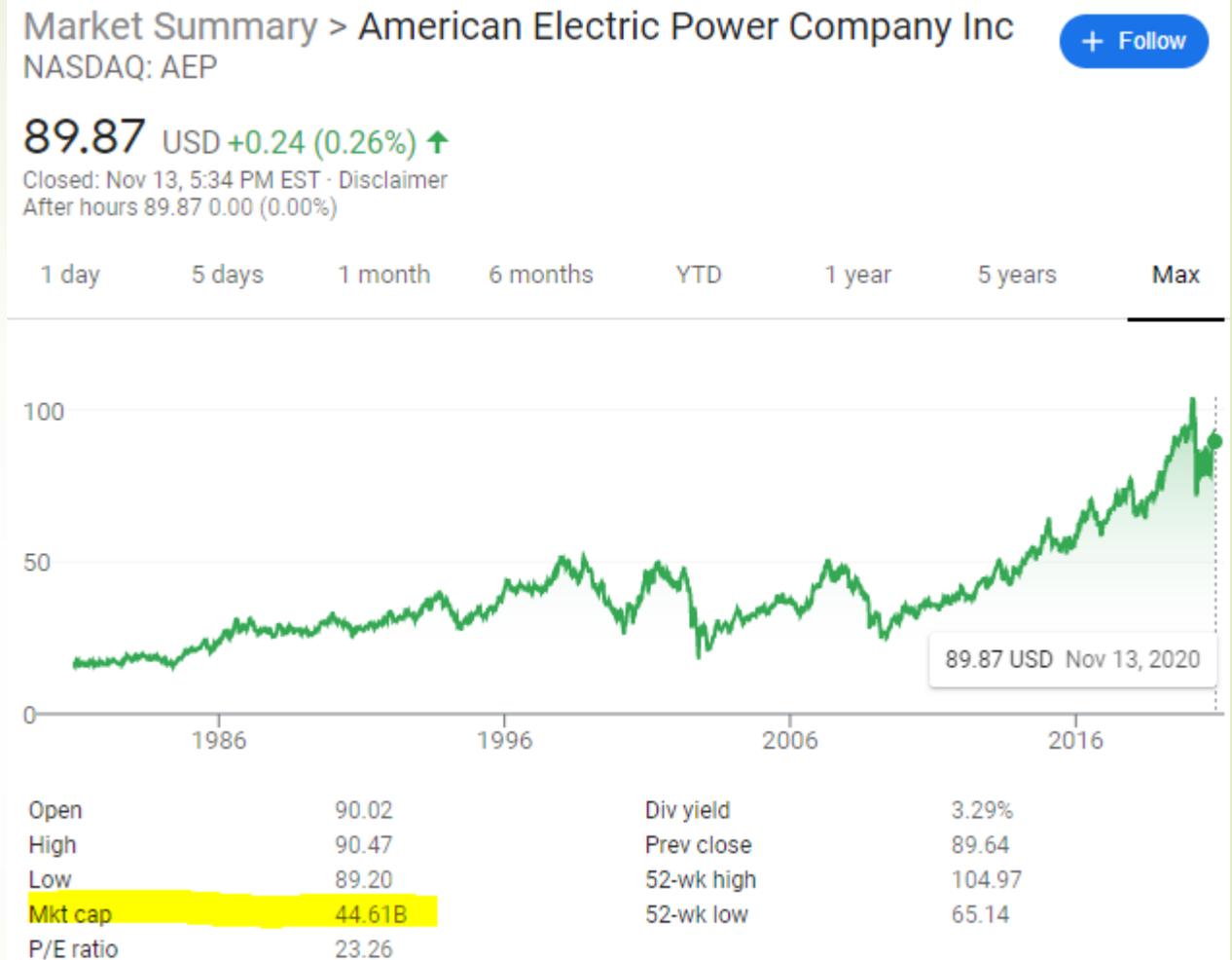
Q4-19	Amount (\$ in millions)	Tax Rate
Pre-tax Income	\$1,907	
Tax at Federal Rate	\$400	21%
Tax at State Rate	\$52	3%
Tax Credits and Amortization	(\$78)	(4%)
Excess Protected and Unprotected	(\$353)	(19%)
Other	(\$34)	(2%)
Tax Expense (Benefit)	(\$13)	(1%)

Estimated 2019 and Future Cash Tax Rates

Description	2019 (\$ in millions)	Future
Consolidated Federal Taxable Income	\$118	
Federal Income Tax Liability before Energy Credits	\$25	
Renewable Energy Credits	(\$19)	
Federal Income Tax Liability after Energy Credits	\$6	
Cash Effective Tax Rate after Energy Credits (Tax Rate after 75% Limitation)	5.25%	5.25%
Other Tax Credit Carryover Utilized	(\$6)	Not Applicable
Federal Income Tax Liability after Other Tax Credit	-	
Cash Effective Tax Rate	0%	5.25%

- It appears that parent company AEP also took advantage of big business tax benefits to avoid paying taxes in 2019.
- They got a \$13 Million “rebate”.
- Source: AEP’s 4th Quarter 2019 Earnings Release Presentation. (page 35)

Unpacking AEP's Wall Street activities. What does "investor-owned" mean?



- AEP's Stock "Market Cap" is \$44.61 BILLION.
- This means that investors own \$44.61B in AEP stock.
- Investors profit in two ways:
 - Stock price gains over time - (common knowledge).
 - "Dividends", usually paid quarterly (not widely understood by general public)
- Graphic Source: Google

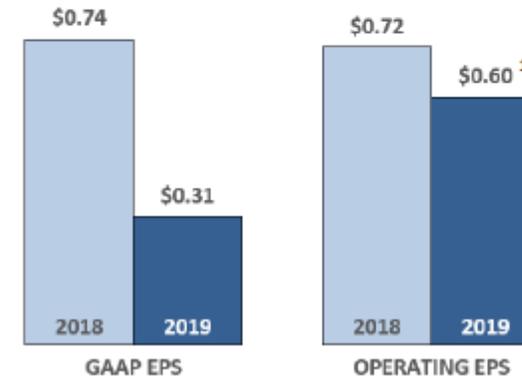
.....AEP stock gains.....

4th Quarter 2019 Financial Update

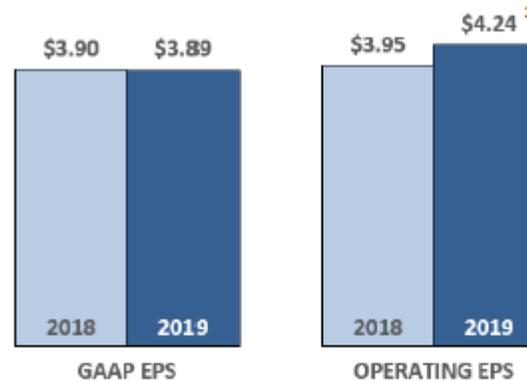


- 5 year shareholder return of 85.6%
- Beat S&P 500 Utilities index BY 25% (5 year period)
- See Earnings per share! Wowza!

4th Quarter 2019



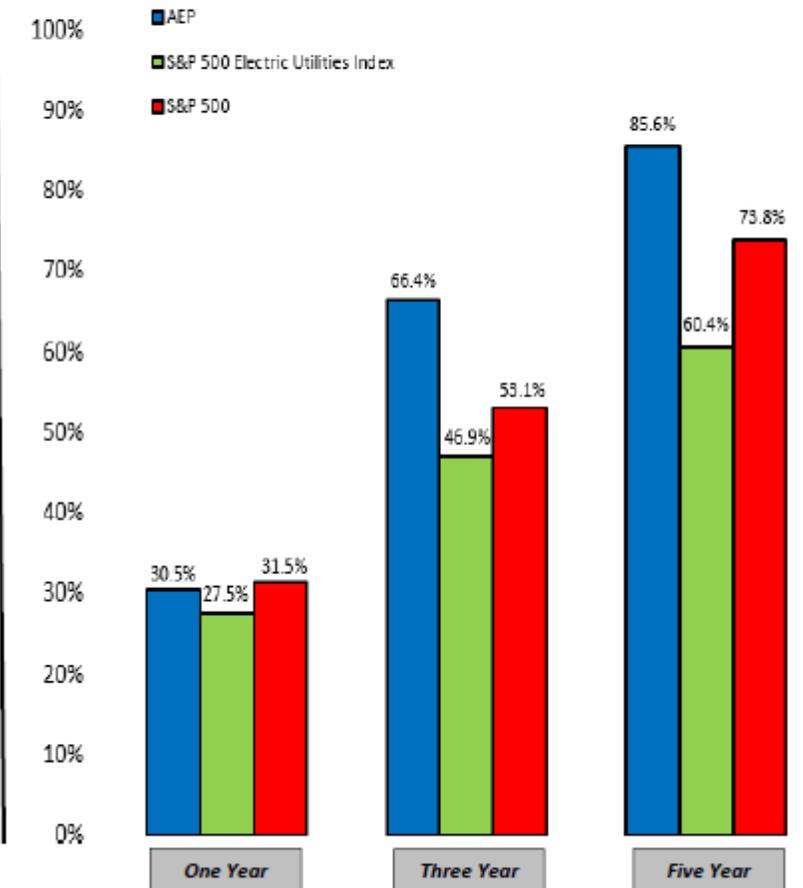
YTD 2019



¹ Quarterly EPS is a stand alone amount and not always additive to full year amount due to rounding

Refer to Appendix for reconciliation between GAAP and Operating EPS

Total Shareholder Return



➤ Source: AEP 4th Quarter 2019 Earnings Release Presentation page 6

Dividends paid to stockholders by AEP

Financing Activities

	Years Ended December 31,		
	2019	2018	2017
		(in millions)	
Issuance of Common Stock	\$ 65.3	\$ 73.6	\$ 12.2
Issuance/Retirement of Debt, Net	4,244.1	2,435.1	691.8
Dividends Paid on Common Stock	(1,350.0)	(1,255.5)	(1,191.9)
Other	(96.5)	(91.3)	(117.0)
Net Cash Flows from (Used for) Financing Activities	\$ 2,862.9	\$ 1,161.9	\$ (604.9)

- ▶ AEP paid dividends of over a BILLION dollars a year to stockholders for the last 3 years.
- ▶ Dividends is money that goes to stockholders that is in addition to the share value gains on their stock.
- ▶ Source: AEP 2019 Annual Report. (page 41)

Dividends paid in 2020

(\$ millions)	QTD	Year-to-Date	
	2020	2020	2019
Dividends Paid	(351.1)	(1,055.7)	(1,002.0)

- ▶ AEP continued to pay dividends of over a BILLION dollars in 2020! – the year of COVID!
 - ▶ It's one thing to ask for a rate hike on poor people,
 - ▶ It's another thing to ask for a rate hike on the “working poor” during COVID mass job losses.
 - ▶ But AEP is asking to raise rates on poor people during COVID mass job losses **while continuing to pay Wall Street stock holders \$1 Billion per year in dividends.**



Summary

- ▶ AEP is asking the Kentucky Public Service Commission to authorize a rate hike of 25% on customers in 10 of the poorest 100 counties in the United States.
- ▶ AEP paid \$3.8 Billion (with a B) in dividends to stockholders 2017-2019.
- ▶ AEP has paid over \$1 Billion in dividends to date – THIS YEAR.
- ▶ AEP raised customers rates by \$210 Million in 2019 and avoided paying income taxes.

- ▶ KPCo and AEP are doing great financially according to their own reports to stockholders.
- ▶ KPCo electricity rates are already comparatively high.
- ▶ Eastern Kentucky households are least capable of dealing with a rate increase.



Non-Payment/Return Mail:
PO BOX 24401
CANTON, OH 44701-4401

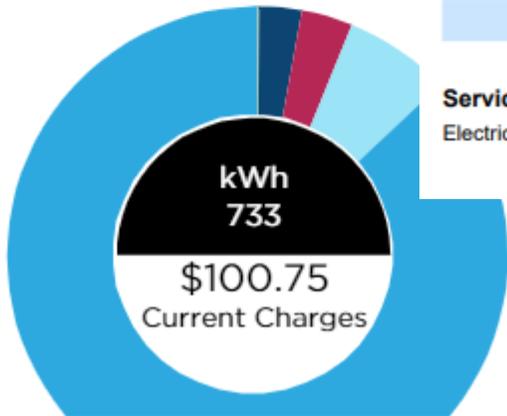
SERVICE ADDRESS: ARCHIE TRAVIS BOWLING



ARCHIE TRAVIS BOWLING
CORR E BOWLING
3970 HIGHWAY 15 S
JACKSON, KY 41339-8677

Current bill summary:
Billing from 10/10/20 - 11/09/20 (31)

DSM \$0.14
Taxes & Fees
Fuel Ad



The Dayton Power and Light Company
dpandl.com

ARCHIE T BOWLING
3970 HIGHWAY 15S
JACKSON KY 41339

Account Number [REDACTED]
Due Date 08/26/2020
Amount Due \$81.61

Page 1 of 2

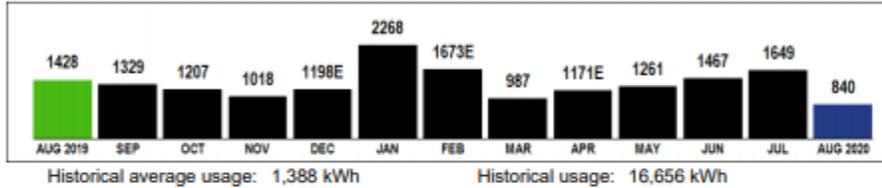
Monthly Account Summary		Mail Date: 08/11/2020
Previous Balance	\$156.12	
08/07/2020 Payment - Thank You	-156.12	
Balance Forward	0.00	
Delivery Total Billed This Month	40.77	
Supply Total Billed This Month	40.84	
Total Account Balance	\$81.61	

Metered and Other Services

Service Address: 2881 STRALEY RD, XENIA OH 45385

Next Reading Date: FINAL

Historical Usage



Billing Period	Average Daily kWh	Temperature Avg High	Temperature Avg Low
Same Period Last Year	**	**	**
Previous Period	**	**	**
Current Period	38.2	**	**

** Unavailable

Usage Detail

Service	Meter Use	Billing Period		Billing Days	Meter Reading		Multiplier	Usage	Rate	Rate Description
		From	To		Previous	Current				
Electric	Actual	07/14/20	08/05/20	22	99191	31	1	840	741	Residential Heating

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: Case 2020-00174
Date: Thursday, November 19, 2020 10:12:00 AM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

From: [REDACTED]
Sent: Wednesday, November 18, 2020 6:23 PM
To: PSC Public Information Officer <PSC.Info@ky.gov>
Subject: Case 2020-00174

As a rooftop solar electric utility consumer I am strongly against allowing utility companies to disallow net metering. I would not have installed my solar panels if net metering were not available. In addition I plan to expand my solar array only if net metering is available. The jobs created by the solar industry will be in jeopardy if utilities cannot offer net metering.

Thank you,

Walter Mastropaolo
2003 Emerson Ave
Louisville, Ky 40205

From: [Bruner, Brandon S \(PSC\)](#) on behalf of [PSC Executive Director](#)
To: [REDACTED]
Subject: RE: case number 2020-00174
Date: Thursday, November 19, 2020 3:23:00 PM

Thank you for your comments on the application of Kentucky Power Company. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2020-00174, in any further correspondence. The documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?Case=2020-00174.

Thank you for your interest in this matter.

Best Regards,

Brandon Bruner
Administrative Branch Manager
Filings Branch
General Administration

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

-----Original Message-----

From: will strobel [REDACTED]
Sent: Tuesday, November 10, 2020 5:23 PM
To: PSC Meeting <PSC.Meeting@ky.gov>
Subject: case number 2020-00174

Hello, I live in Bowling Green. Please do not raise the rates at this time. Take more time to collect more data and make a decision. This is not what Kentuckians or myself needs at the moment. I am passionate about solar energy and it's availability to low and moderate income families. Thank you for your time.

Best,

Will Strobel

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