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June 1, 2011

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JUN 2 2011

PUBLIC SERVICE
COMMISSION

Via USPS Express Mail/Overnight Delivery

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

**Re: Case No. 2011-00134
Joint Application of Louisville Gas and Electric Company and Kentucky
Utilities Company For Review, Modification, and Continuation of Existing, and
Addition of New, Demand-Side Management and Energy-Efficiency Programs**

Dear Mr. Derouen:

Enclosed for filing in the above-captioned matter please find an original plus ten (10) copies of Tendered First Request For Information of Association of Community Ministries, Inc., which filed its Motion for Full Intervention on May 10, 2011. If intervention is granted, ACM requests that the Joint Applicants respond to the enclosed.

Very truly yours,

Eileen L. Ordover
Counsel for ACM

Cc: Service List



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 2 2011

PUBLIC SERVICE COMMISSION

In The Matter Of:

JOINT APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY AND KENTUCKY UTILITIES) CASE NO.
COMPANY FOR REVIEW, MODIFICATION, AND) 2011-00134
CONTINUATION OF EXISTING, AND ADDITION)
OF NEW, DEMAND-SIDE MANAGEMENT AND)
ENERGY-EFFICIENCY PROGRAMS)

TENDERED FIRST REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY MINISTRIES, INC.

In accordance with the procedural schedule established by the Commission by Order dated May 20, 2011, Association of Community Ministries, Inc. (“ACM”), which filed its Motion For Full Intervention on May 10, 2011, by counsel, tenders its First Request for Information and if intervention is granted, requests the response of the Joint Applicants to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.

(6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please provide a chart with the following projections, and containing the following elements, for the time period to be covered by the instant Application.
 - (a) Total residential DSM/EE dollars to be collected in Jefferson County, broken down by zip code;
 - (b) Total residential DSM/EE dollars to be spent in Jefferson County, broken down by zip code; and
 - (c) For each DSM/EE program component targeting residential customers, the total dollars to be spent in Jefferson County on that program component, broken down by zip code.

2. Please provide a chart with the following data, and containing the following elements, for the time frame commencing with the Commission's March 31, 2008 Order in Case No. 2007-00319 and continuing to date.
 - (a) Total residential DSM/EE dollars collected in Jefferson County, broken down by zip code;
 - (b) Total residential DSM/EE dollars spent in Jefferson County, broken down by zip code; and
 - (c) For each DSM/EE program component targeting residential customers, the total dollars spent in Jefferson County on that program component, broken down by zip code.

3. Please provide the total dollar amount paid in DSM/EE charges by LG&E customers in Jefferson County who have had at least one bill paid by a third-party assistance provider for the time frame commencing with the Commission's March 31, 2008 Order in Case No. 2007-00319 and continuing to date.

4. Please provide the following information concerning the Residential Load Management/Demand Conservation Program:

- (a) A breakdown, by zip code, showing how many load control switches have been installed in Jefferson County under the program to date;
- (b) A breakdown, by zip code, showing how many programmable thermostats have been installed in Jefferson County under the program to date;
- (c) The total number of LG&E customers receiving load control switches or programmable thermostats who have had at least one LG&E bill paid by a third-party assistance provider during the period 2008 through 2010; and
- (d) The cost per installation of load control switches and programmable thermostats, respectively.

5. Are renters eligible to participate in the Residential Load Management/Demand Conservation Program? If not, please explain the rationale for their exclusion.

6. Please provide the following information concerning the Residential Conservation/Home Energy Performance Program:

- (a) A breakdown, by zip code, showing how many on-line energy audits have been completed to date by LG&E customers in Jefferson County;

- (b) A breakdown, by zip code, of how many free compact fluorescent light bulbs have been distributed to LG&E customers in Jefferson County in connection with the online energy audit component to date;
- (c) The total number of LG&E customers in Jefferson County completing on-line energy audits who have had at least one LG&E bill paid by a third-party assistance provider during the period 2008 through 2010;
- (d) The current bill impact of the on-line energy audit component;
- (e) A breakdown, by zip code, showing how many LG&E customers in Jefferson County have participated in the on-site energy audit program to date;
- (f) The total number of LG&E customers participating in the on-site energy audit program in Jefferson County who have had at least one LG&E bill paid by a third-party assistance provider during the period 2008 through 2010; and
- (g) The current bill impact of the on-site energy audit program.

7. Please refer to page 35 of Exhibit MEH-1 to the Direct Testimony of Michael E. Hornung, wherein levels of customer investment and corresponding financial incentives under the Home Energy Performance Program are discussed. Would LG&E be willing to consider adding provisions to the program design, such as tiered income qualifications, to ensure that low income customers are able to participate at a level comparable to their contribution to the DSM/EE fund?

8. Please provide the following information concerning the Residential and Commercial HVAC Diagnostic and Tune Up Program:

- (a) A breakdown, by zip code, showing how many residential diagnostic performance checks have been performed to date in Jefferson County;

- (b) The number of residential customers in Jefferson County receiving diagnostic performance checks who had at least one LG&E bill paid by a third-party assistance provider during the period 2008 through 2010;
- (c) A breakdown, by zip code, of how many residential customers in Jefferson County have taken corrective action under the program following a performance check in (a), above;
- (d) The total number of customers who have taken corrective action as per (c), above, who have had at least one LG&E bill paid by a third-party assistance provider during the period 2008 through 2010; and
- (e) The current residential bill impact of the HVAC Diagnostic and Tune Up Program.

9. Please refer to page 63 of Exhibit MEH-1 to the Direct Testimony of Michael E. Hornung, wherein the Residential High Efficiency Lighting Program is described.

- (a) Please confirm that compact fluorescent light (“CFL”) bulbs provided through direct mail delivery and at customer walk-in centers are provided to customers free of charge.
- (b) Please explain how the Company chooses which LG&E customers will be notified of the opportunity to receive CFL bulbs through direct mail delivery, and how said customers are notified.
- (c) Please provide a breakdown by zip code of the number of postcards or other notifications, respectively, sent to LG&E customers informing them of the opportunity to receive CFL bulbs for free by direct mail.

(d) Please provide the locations of the customer walk-in centers at which CFL bulbs are distributed.

(e) Please state the per-bulb purchase cost of the CFL bulbs distributed to LG&E customers in Jefferson County to date.

(f) Please state the average shipping cost for CFL bulbs provided to LG&E customers in Jefferson County by direct mail.

10. Please continue to refer to page 63 of Exhibit MEH-1 to the Direct Testimony of Michael E. Hornung. Please provide the following:

(a) A breakdown by zip code of the number of CFL bulbs distributed by direct mail to LG&E customers in Jefferson County to date;

(b) The number of Jefferson County customers who received CFL bulbs by direct mail who had an LG&E bill paid by third-party assistance provider during the period 2008 through 2010; and

(c) A breakdown of how many CFL bulbs have been distributed at each customer walk-in center.

11. What specific measures has LG&E incorporated into program design and implementation plans to ensure that low income households in Jefferson County receive an equitable share of DSM/EE dollars spent during the period covered by the instant Application?

12. What specific measures has LG&E incorporated into program design and implementation plans to ensure that renters of single-family homes and units in multi-family buildings, respectively, receive, or benefit from, an equitable share of DSM/EE dollars spent during the period covered by the instant Application regardless of whether they pay their own utility bills or these charges are included in the rent?

13. Please refer to section 4.3 on page 38 of Exhibit MEH-1 to the Direct Testimony of Michael E. Hornung, where it is stated that “[e]ligible WeCare households will include but not be limited to those residential customers who qualify for Federal Low-Income Weatherization Assistance Program (WAP) or Low Income Home Energy Assistance Program (LIHEAP) services.”

(a) Please describe the criteria that will be employed to determine which residential customers other than those eligible for WAP or LIHEAP will be eligible for WeCare.

(b) Please explain how the criteria in (a) differ from those currently employed.

14. In determining WeCare eligibility based upon LIHEAP eligibility, does LG&E use the KY ceiling for financial eligibility or the federal ceiling for financial eligibility? If the latter, do the companies use the percentage of poverty guideline or the percentage of state median income guideline?

15. Please provide a step-by-step description of the various processes by which LG&E customers may enter and qualify for the WeCare program, from the point of outreach/recruitment or other point of entry through the point at which an appointment for a home energy audit is scheduled, or a determination is made that the customer is not eligible for the program.

16. Please provide copies of all policies, procedures, criteria, protocols and manuals the Joint Applicants and/or their vendors use in recruiting, screening and selecting LG&E customers and providing weatherization services to them under the WeCare program in Jefferson County, including any policies, procedures, protocols or manuals revised in anticipation of approval of the changes to WeCare that are the subject of this proceeding.

17. Please refer to pages 14-15 of the Direct Testimony of Michael Hornung. Note that on line 15-16 of page 14, and on lines 3 – 5 of page 15, it is stated that the monthly bill impact of the new DSM/EE programs and program enhancements will be \$2.06 for LG&E residential electric customers, and \$1.68 for LG&E residential gas customers, respectively, based on certain monthly levels of energy usage. Assuming the same monthly energy usage, please provide a breakdown of the monthly bill impact of each respective new DSM/EE program and program enhancement.

18. Please continue to refer to the above-referenced testimony concerning monthly bill impacts, and refer as well to page 4, line 1, through page 7, line 16 of the Direct Testimony of Lonnie E. Bellar, discussing the Companies' proposal to record the costs of new load control switches and programmable thermostats as capital costs. What would the monthly bill impacts be if these costs were expensed instead?

19. Please provide a breakdown by zip code of the average monthly electric usage and average monthly gas usage of LG&E customers in Jefferson County for each of the years 2008, 2009 and 2010.

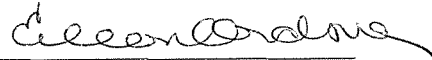
20. Please provide the average monthly electric usage and average monthly gas usage of LG&E customers for whom at least one bill was paid by a third-party assistance provider for each of the years 2008, 2009 and 2010.

21. Is LG&E able to identify which of its residential customers use gas for heating and/or hot water?

22. Please refer to pages 52 - 55 of Exhibit MEH-1 to the Direct Testimony of Michael E. Hornung, wherein the Residential Incentives Program is discussed. Please provide the data documenting the assumptions regarding the number of customers who will make

purchases as a result of the availability of incentives, versus those who would have made such purchases regardless.

Respectfully submitted,



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Lisa Kilkelly

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Counsel for ACM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Tendered First Request For Information Of Association of Community Ministries, Inc. was served on the following parties on the 1st day of June, 2011 by United States mail, postage prepaid.



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