

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR CERTIFICATES OF PUBLIC	)	
CONVENIENCE AND NECESSITY AND APPROVAL	)	CASE NO.
OF ITS 2011 COMPLIANCE PLAN FOR RECOVERY	)	2011-00162
BY ENVIRONMENTAL SURCHARGE	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO METROPOLITAN HOUSING COALITION


Metropolitan Housing Corporation ("MHC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 15 copies of the following information, with a copy to all parties of record. The information requested herein shall be filed no later October 13, 2011. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

MHC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which MHC fails or

refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond. Careful attention shall be given to copied material to ensure that it is legible.

1. Refer to the Direct Testimony of Cathy Hinko at page 6. Beginning at line 13, the testimony states that MHC requests that the Commission "urge LG&E/KU to explore the implementation of an environmental surcharge fee waiver or reduction for qualified low-income households and/or a credit for those households to offset rate increases." Does Ms. Hinko believe that the Commission has the authority under its statutes to approve such a fee waiver, reduction, or credit for qualified low-income households? If yes, provide the statute citation.



---

Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602

DATED SEP 30 2011

cc: Parties of Record

Case No. 2011-00162

Lonnie Bellar  
Vice President, State Regulation & Rates  
LG&E and KU Services Company  
220 West Main Street  
Louisville, KENTUCKY 40202

Honorable Dennis G Howard II  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, KENTUCKY 40601-8204

David Brown  
Stites & Harbison, PLLC  
1800 Providian Center  
400 West Market Street  
Louisville, KENTUCKY 40202

Honorable Michael L Kurtz  
Attorney at Law  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
Suite 1510  
Cincinnati, OHIO 45202

Robert M Conroy  
Director, Rates  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40202

Honorable Kendrick R Riggs  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

Thomas J FitzGerald  
Counsel & Director  
Kentucky Resources Council, Inc.  
Post Office Box 1070  
Frankfort, KENTUCKY 40602

Allyson K Sturgeon  
Senior Corporate Attorney  
LG&E and KU Services Company  
220 West Main Street  
Louisville, KENTUCKY 40202

Robert A Ganton, Esq  
Regulatory Law Office - U.S. Army Leg  
901 North Stuart Street, Suite 525  
Arlington, VIRGINIA 22203

Edward George Zuger, III  
Zuger Law Office PLLC  
P.O. Box 728  
Corbin, KENTUCKY 40702

Esq Scott E Handley  
Administrative Law Division - Office  
50 Third Avenue, Room 215  
Fort Knox, KENTUCKY 40121

Kristin Henry  
Staff Attorney  
Sierra Club  
85 Second Street  
San Francisco, CALIFORNIA 94105