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June 27, 2011

Via USPS Express Mail/Overnight Delivery

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

RECEIVED

JUN 28 2011

PUBLIC SERVICE
COMMISSION

**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 Second Request For Information of Association of Community Ministries, Inc.

Thank you for your assistance in this matter. Please contact me if you need further information.

Very truly yours,

Eileen L. Ordover
Counsel for ACM

Cc: Parties of Record



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 28 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)**

**SECOND 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 (“ACM”), by counsel, requests the response of the Joint Applicants 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 refer to the Company's response to Question 1 of ACM's First Tendered Request for Information, including the chart provided therein. Please explain in detail why the Company cannot apply the assumptions underlying the chart to a subset of its customer base, to yield the requested breakdown for Jefferson County as a whole and by Jefferson County zip code. Please include an explanation of all of the specific processes and steps that would be required to yield these requested breakdowns, and why, as stated in the Company's response, it is unable to do so.

2. Please refer to the chart included as part of the Company's response to Question 2 of ACM's First Tendered Request for Information.

(a) Please state whether the figures provided are for Jefferson County only, or whether they are companywide.

(b) If the figures are companywide, please provide the figures for Jefferson County, broken down by zip code, as requested.

(c) Should the Company decline to provide the requested Jefferson County figures and/or zip code breakdowns, please explain in detail why it so declines, including an explanation of all of the specific processes and steps that would be required to produce the information and why the Company cannot undertake them.

3. Please refer to Question 3 of ACM's First Tendered Request for Information, asking for "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 to date,"

and the Company's response, wherein it is stated that the requested information "is not readily available and would require significant time and effort not permitted in the schedule."

(a) Does the Company have the records necessary to produce the requested information?

(b) Please provide a detailed explanation of all of the processes and steps that would be required to produce the requested information, including an explanation of why they are unduly time-consuming in comparison to those required to produce other information the Company has provided the various parties pursuant to the schedule governing this proceeding. Please explain further why the Company has been able to produce information about recipients of third-party assistance in response to Questions 4(c), 6(f) and 20 of ACM's First Tendered Request, but not in response to Question 3.

4. Please provide the total number of residential customers in Jefferson County who had at least one bill paid by a third-party assistance provider during each of the following time periods, respectively: 3/31/2008 – 12/31/2008; calendar year 2009; and calendar year 2010.

5. Please refer to the Company's response to Question 4 of ACM's First Tendered Request for Information.

(a) Please provide the information set forth in item (a) of the Company's response for Jefferson County only, broken down by zip code, as requested. Should the Company decline to provide the requested Jefferson County figure and/or zip code breakdowns, please explain in detail why it so declines, including but not limited to an explanation of all of the specific processes and steps that would be required to produce the information; why the Company cannot

undertake them; and why the Company was able to produce various customer data broken down by zip code in response to ACM's Second Request for Information in Case No. 2009-00549, but declines to do so in response to the instant request.

(b) How many of the customers included in the figure set forth in item (c) of the Company's response are Jefferson County customers?

(c) Please provide the information requested regarding programmable thermostats in item (b) of ACM's First Tendered Request, regardless of whether the thermostats have been or will be removed. Should the Company decline to provide the requested Jefferson County figure and/or zip code breakdowns, please explain in detail why it so declines, including but not limited to an explanation of all of the specific processes and steps that would be required to produce the information; why the Company cannot undertake them; and why the Company was able to produce various customer data broken down by zip code in response to ACM's Second Request for Information in Case No. 2009-00549, but declines to do so in response to the instant request.

6. Please refer to the Company's response to Question 6 of ACM's First Tendered Request for Information.

(a) Please provide the information set forth in items (a), (b) and (e) of the Company's response for Jefferson County only, broken down by zip code, as requested. Should the Company decline to provide the requested Jefferson County figure and/or zip code breakdowns for any or all of items (a), (b) or (e), please explain in detail, respectively, why it so declines, including but not limited to an explanation of all of the specific processes and steps that would be required

to produce the information; why the Company cannot undertake them; and why the Company was able to produce various customer data broken down by zip code in response to ACM's Second Request for Information in Case No. 2009-00549, but declines to do so in response to the instant request.

(b) Please refer to the Company's response to item (c), wherein it is stated that the requested information "is not readily available and would require significant time and effort not permitted in the schedule." Please explain in detail all of the specific processes and steps that would be required to produce the requested information, including an explanation of why they are unduly time-consuming in comparison to those required to produce other information the Company has provided the various parties pursuant to the schedule governing this proceeding. Please explain further why the Company has been able to produce information about recipients of third-party assistance in response to Questions 4(c), 6(f) and 20 of ACM's First Tendered Request, but not in response to Question 6(c).

(c) Please refer to the Company's response to item (f). Please provide the number of Jefferson County customers, as requested. Should the Company decline to provide the requested Jefferson County figure and/or zip code breakdowns, please explain in detail why it so declines, including but not limited to an explanation of all of the specific processes and steps that would be required to produce the information and why the Company cannot undertake them.

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, and to the Company's response to

Question 7 of ACM's First Tendered Request. For the time frame commencing with the Commission's March 31, 2008 Order in Case No. 2007-00319 and continuing to date, please provide:

(a) the total number of LG&E customers in Jefferson County who reached the second and third tiers, respectively, under the Home Energy Performance Program; and

(b) the number of Jefferson County customers reaching the second and third tiers, respectively, who had at least one LG&E bill paid by a third-party assistance provider during the period in question.

8. Please refer to the Company's response to Question 8 of ACM's First Tendered Request for Information.

(a) Please provide the information set forth in items (a) and (c) of the Company's response for Jefferson County only, broken down by zip code, as requested.

Should the Company decline to provide the requested Jefferson County figure and/or zip code breakdowns for either or both of (a) or (c), please explain in detail, respectively, why it so declines, including but not limited to an explanation of all of the specific processes and steps that would be required to produce the information; why the Company cannot undertake them; and why the Company was able to produce various customer data broken down by zip code in response to ACM's Second Request for Information in Case No. 2009-00549, but declines to do so in response to the instant request.

(b) Please refer to the Company's responses to items (b) and (d), wherein it is stated that the requested information "is not readily available and would require

significant time and effort not permitted in the schedule.” Please explain in detail all of the specific processes and steps that would be required to produce the requested information in each instance, including an explanation of why they would be unduly time-consuming in comparison to those required to produce other information the Company has provided the various parties pursuant to the schedule governing this proceeding. Please explain further why the Company has been able to produce information about recipients of third-party assistance in response to Questions 4(c), 6(f) and 20 of ACM’s First Tendered Request, but not in response to Question 8(b) or (d).

9. Please refer to the Company’s response to Question 9, item (b) of ACM’s First Tendered Request for Information.

(a) How often are customers sent the referenced direct mail pieces notifying them of the opportunity to receive CFL bulbs?

(b) Are all customers throughout LG&E’s service territory sent the referenced direct mail pieces on a uniform schedule with regard to frequency? If not, please describe any variations and the reason(s) therefore.

(c) Please provide copies of any reports tracking, monitoring or evaluating customer response to the direct mail marketing of the CFL program.

(d) Has the Company undertaken any studies or reviewed any data regarding geographic variations, whether by county, zip code or other parameter, in the response rate for the CFL program? If so, please provide such studies and/or data.

10. Please refer to the Company’s response to Question 10(a) of ACM’s First Tendered Request for Information, where it is stated that the requested information “is not

readily available and would require significant time and effort not permitted in the schedule.”

Please explain in detail all of the specific processes and steps that would be required to produce the requested information, including an explanation of why they are unduly time-consuming in comparison to those required to produce other information the Company has provided the various parties pursuant to the schedule governing this proceeding.

11. Please refer to the Company’s response to Question 10(b) of ACM’s First Tendered Request for Information, where it is stated that the requested information “is not readily available and would require significant time and effort not permitted in the schedule.” Please explain in detail all of the specific processes and steps that would be required to produce the requested information, including an explanation of why they are unduly time-consuming in comparison to those required to produce other information the Company has provided the various parties pursuant to the schedule governing this proceeding. Please explain further why the Company has been able to produce information about recipients of third-party assistance in response to Questions 4(c), 6(f) and 20 of ACM’s First Tendered Request, but not in response to Question 10(b).

12. Please provide a list of the types of customer data by county and/or zip code and/or receipt of third-party assistance that the Company would characterize as “readily available,” as that term is used in its responses to ACM’s First Tendered Requests for Information.

13. Please refer to the Company’s response to Question 11 of ACM’s First Tendered Request for Information, where it is stated that “the proposed WeCare seven-year budget now represents 13% of the total portfolio of program budget....”

- (a) Please provide copies of any studies, reports or other analyses underlying the Company's decision to allocate 13% of the total program budget to WeCare.
- (b) Please identify any additional data or other factors taken into consideration beyond those included in response to (b), above.
- (c) Did the Company consider allocating a greater percentage of the program budget to WeCare prior to adopting the 13% level? If so, please state the figure(s) considered, explain why any higher figure(s) was rejected, and provide copies of any supporting analyses.

14. Is WeCare available to renters regardless of the number of units in the building in which they reside, or is there a limit? If there is a limit, what is the underlying rationale, and what options exist for renters thus excluded?

15. Are tenants who have utilities included in their rent eligible for WeCare, notwithstanding the eligibility requirement of 12 months of usage history?

16. Please provide the name of the third-party contractor(s) referenced in the Company's response to Question 15 of ACM's First Tendered Request, and copies of all WeCare contracts in effect for the LG&E service territory during the time frame commencing with the Commission's March 31, 2008 Order in Case No. 2007-00319 and continuing to date.

17. For the time frame commencing with the Commission's March 31, 2008 Order in Case No. 2007-00319 and continuing to date, please provide:

- (a) the total number of LG&E households receiving WeCare services; and
- (b) the number of such recipients who had been contacted for that purpose by a third-party contractor working from a list of LIHEAP recipients, as described in the Company's response to Question 15 of ACM's First Tendered Request.


18. Please refer to the Company's responses to Questions 15 and 16 of ACM's First Tendered Request. Was it the Company's intended response that its third-party contractor(s) do not use any written policies, procedures, criteria, protocols or manuals in screening, selecting or providing weatherization services to LG&E customers under the WeCare program? If this was not the Company's intended response, please provide copies of the requested policies, procedures, criteria, protocols and/or manuals.

19. Does the Company ever analyze or utilize customer data by county, zip code, or other geographic subset of its service territory for marketing or other purposes? If so, please describe what kind of information is thus analyzed or used.

20. Please provide the following figures:

- (a) total number of LG&E residential customers;
- (b) total number of LG&E residential customers in Jefferson County; and
- (c) Jefferson County LG&E residential customers by zip code.

Respectfully submitted,



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Counsel for ACM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Second Request For Information of Association of Community Ministries, Inc. was served on the following parties on the 27th day of June, 2011 by United States mail, postage prepaid.



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