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PUBLIC SERVICE
COMMISSION

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August 19, 2011

Docket Clerk
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

**Re: In the Matter Of: Application of Louisville Gas and Electric Company for
Certificates of Public Convenience and Necessity and Approval of its 2011
Compliance Plan For Recovery By Environmental Surcharge
Docket No. 2011-00162**

Dear Docket Clerk:

Please find for filing the original and fifteen (15) copies of Metropolitan Housing Coalition's Supplemental Requests to Louisville Gas and Electric Company for Information in the above-captioned case. All parties have been served. Thanks very much.

Cordially,

Tom FitzGerald
Counsel for MHC

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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AUG 22 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

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

**METROPOLITAN HOUSING COALITION'S SUPPLEMENTAL REQUESTS
TO LOUISVILLE GAS AND ELECTRIC COMPANY FOR INFORMATION**

Pursuant to the scheduling order adopted by the Commission in this case on August 5, 2011, Metropolitan Housing Coalition (MHC) requests that Louisville Gas and Electric Company (LGE) file with the Commission by September 1, 2011 the following information, with a copy to all parties of record. For each response to request for information,

- (1) Please identify the individual responsible for answering each request;
- (2) These requests shall be deemed continuing so as to require further and supplemental responses if LGE receives or generates additional information within the scope of these requests between the time of the response and the time of the hearing;
- (3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian;

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information;

(5) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self-evident to a person not familiar with the printout;

(6) If LGE objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify MHC's Attorney of Record as soon as possible;

(7) For any document withheld on the basis of privilege, state the following: date; author; addressee; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted;

(8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state the identity of the person by whom it was destroyed or transferred; the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy; and

(9) Where the information requested is the same as has been provided to another party in response to a request for information, it is sufficient to identify that response rather than duplicating the information requested.

Request For Information 1

Given the significant rate increase proposed by LG&E and the potential to adversely affect low and fixed-income ratepayers:

- a. Please describe any new or enhanced low-income ratepayer assistance programs that LG&E is proposing to address the impact of the rate increase on those ratepayers;
- b. Please describe and compare low- income ratepayer assistance programs offered by PPL in other states served by the company or its subsidiaries; and
- c. To the extent that PPL or its subsidiaries have such programs in other jurisdictions served, please describe the eligibility requirements for such programs and whether those programs were company-initiated or were instituted to comply with state regulations or Commission Orders; and
- d. Please describe any barriers to implementation of similar programs in the LG&E service area.

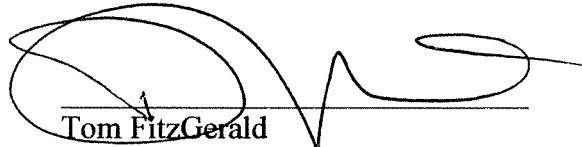
Request for Information 2

In the development and comparison of compliance strategies for each operating unit identified in this case within the LG&E/KU system, did LG&E/KU include comparison of retirement of any unit and replacement of that unit's capacity with renewable energy that could be purchased by or generated by LG&E/KU, or with increased investment in energy efficiency to offset retired capacity?

- a. If so, please provide the assessment and the assumptions made concerning the relative costs of retrofitting each unit for compliance compared with the costs of investment in acquisition of or generation of renewable energy.

- b. Similarly please provide any assessment and comparison of the costs of installing controls for compliance relative to retirement of each unit and investment in energy efficiency strategies to offset the loss of capacity for the retired unit.
- c. If no such comparison was made of the costs of retrofitting the operating units for compliance relative to the costs of retirement of and replacement of the retired capacity with investment in renewable energy and/or energy efficiency, please explain why no such comparison was made.

Respectfully submitted,



Tom FitzGerald
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FitzKRC@aol.com

Counsel for Metropolitan Housing Coalition

CERTIFICATE OF SERVICE

I certify that an original and fifteen (15) copies of Metropolitan Housing Coalition's Supplemental Requests to Louisville gas and Electric Company For Information were mailed for filing with the Docket Clerk, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 and that a true and accurate copy of the foregoing was mailed via first class U.S. Mail, postage prepaid, this 19th day of August, 2011, to the following:

Lonnie E Bellar
LG&E and KU Services Company
220 West Main Street
Louisville, KY 40202

Kendrick R Riggs, Esq.
Stoll Keenon Ogden, PLLC
2000 PNC Plaza

500 W Jefferson Street
Louisville, KY 40202-2828

Allyson K. Sturgeon, Esq.
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202

Robert M. Conroy, Director, Rates
Kentucky Utilities Company
220 W. Main Street
Louisville, KY 40202

Hon. Dennis Howard II
Office of the Attorney General
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Frankfort, Kentucky 40601-8204

Hon. Michael L. Kurtz
Boehm Kurtz and Lowry
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David Brown, Esq.
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1800 Providian Center
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Lee Thomason, Esq.
Spalding & Thompson
106 North Fourth Street
Bardstown, Kentucky 40004

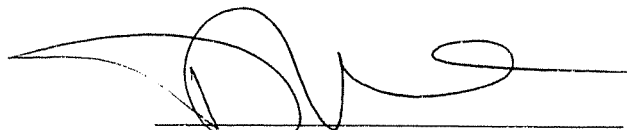
Scott Handley, Esq.
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Chicago IL 60660

A handwritten signature in black ink, appearing to read "Tom Fitzgerald", written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the right.

Tom Fitzgerald