COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

)	
)	
)	
)	CASE NO.
)	2013-00487
)	
)	
)	
))))))

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO ALEXANDER DESHA AND SIERRA CLUB

Alexander DeSha and the Sierra Club (collectively "Sierra Club"), pursuant to 807 KAR 5:001, are to file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due no later than April 25, 2014. 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 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.

Sierra Club 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 Sierra Club 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 should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

- 1. Refer to page 13 of Alexander DeSha and Sierra Club's comments regarding Kentucky Power Company's ("Kentucky Power") DSM Application, which states, "In sum, Sierra Club supports KPC's proposal to increase its investment in DSM in 2014 and urges the Company to consider further program improvements and additions to allow it to achieve greater levels of energy savings, which would benefit KPC and its customers."
- a. Explain how Kentucky Power can achieve greater levels of energy savings and program improvements/enhancements in its demand-side management ("DSM")/energy efficiency ("EE") portfolio.
- b. Provide a description of DSM/EE programs not currently in Kentucky Power's DSM/EE portfolio that Kentucky Power might consider in achieving energy savings, considering the declining customer base, decreasing load, geographic location, unemployment rate, and income level of potential participants.

Jeff Derouen Executive Director Public Service Commission P.O. Box 615

Frankfort, KY 40602

APR 1 1 2014 DATED

cc: Parties of Record

Joe F Childers Joe F. Childers & Associates 300 Lexington Building 201 West Short Street Lexington, KENTUCKY 40507

Lila P Munsey Manager, Regulatory Services Kentucky Power 101A Enterprise Drive Frankfort, KENTUCKY 40601

Honorable Mark R Overstreet Attorney at Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634

Jill Tauber Earthjustice 1625 Massachusetts Avenue, N.W., Sui Washington, DISTRICT OF COLUMBIA