## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF COLUMBIA GAS OF KENTUCKY, ) CASE NO. INC. FOR AN ADJUSTMENT IN RATES ) 2009-00141

FIRST DATA REQUEST OF COMMISSION STAFF
TO THE COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE,
BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC.

The Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. ("CAC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than August 24, 2009. 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 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.

The CAC 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 the CAC 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. 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 18 of the Direct Testimony of Jack E. Burch ("Burch Testimony"). Mr. Burch states that the council is very supportive of Columbia's proposed residential Demand-Side Management ("DSM") program. Does the CAC believe that Columbia's proposed program will begin to effectively address the needs of low-income customers? Explain the response.
- 2. Refer to page 17 of the Burch Testimony, which includes a discussion of the potential savings of participant households resulting from the proposed furnace replacement program. Does the CAC have any concern that the proposed furnace replacement program, the energy audit program, or the high-efficiency appliance rebate program will not produce significant cost savings? Explain the response.
- 3. Refer to page 16 of the Burch Testimony, which states that Columbia's contracting with the council will ensure there will be no duplication of services as regularly occurs in other utility companies' DSM programs.
- a. Describe, generally, Mr. Burch's experience with other companies' DSM programs and any particular instances of duplication.

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b. Describe, in detail, the systems and checks the council has in place to avoid duplication of services to households.

Jeff Derouen

**Executive Director** 

**Public Service Commission** 

P.O. Box 615

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DATED AUG 1 2 2009

cc: All Parties

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