

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF PPL CORPORATION, E.ON AG,)	
E.ON US INVESTMENTS CORP., E.ON U.S. LLC,)	
LOUISVILLE GAS AND ELECTRIC COMPANY, AND)	CASE NO.
KENTUCKY UTILITIES COMPANY FOR APPROVAL OF)	2010-00204
AN ACQUISITION OF OWNERSHIP AND CONTROL OF)	
UTILITIES)	

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

The Metropolitan Housing Coalition ("MHC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than August 27, 2010. 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. 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 line 29 on page 5 to line 2 on page 6 of the Direct Testimony of Cathy Hinko ("Hinko Testimony"), in which Ms. Hinko expresses concerns about the experience and expertise of PPL Corporation ("PPL") regarding gas utility services. Explain whether MHC is aware of the content of PPL's Response to Item 1 of the Commission Staff's July 16, 2010 Information Request to the Applicants in this proceeding.

2. Refer to lines 20-28 on page 6 of the Hinko Testimony, in which Ms. Hinko discusses governance of the Demand-Side Management ("DSM") programs of Louisville Gas and Electric Company ("LG&E").


a. Explain whether MHC is familiar with KRS 278.285, which addresses the Commission's authority regarding utility DSM programs.

b. Has MHC intervened in any Commission proceeding involving LG&E's existing DSM programs?

c. Since 2001, when many of LG&E's existing DSM programs were implemented, to what extent has MHC attempted to discuss and/or work with LG&E in regard to developing new or modifying existing DSM programs?

3. Refer to line 29 on page 6 to line 5 on page 7 of the Hinko Testimony.

Provide a general description of the Energy Education Center referenced therein.



Jeff Derouen
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Public Service Commission
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DATED AUG 16 2010

cc: Parties of Record

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