

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY AND KENTUCKY UTILITIES )  
COMPANY FOR REVIEW, MODIFICATION, AND ) CASE NO.  
CONTINUATION OF EXISTING, AND ADDITION OF ) 2011-00134  
NEW, DEMAND-SIDE MANAGEMENT AND )  
ENERGY-EFFICIENCY PROGRAMS )

COMMISSION STAFF'S FIRST INFORMATION REQUEST TO  
METROPOLITAN HOUSING COALITION

The Metropolitan Housing Coalition ("MHC"), 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 on or before August 19, 2011. 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.

The 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. Provide a brief explanation of MHC's understanding of the purpose of Demand Side Management ("DSM") programs.

a. Does MHC believe that DSM programs should pay for themselves?

b. Provide a brief explanation of MHC's understanding of the purpose of Energy Efficiency ("EE") programs. Include in the explanation whether MHC believes that DSM and EE Programs are the same.

2. Refer to page 2 of the Direct Testimony of Cathy Hinko on Behalf of Metropolitan Housing Coalition ("MHC Testimony"), dated July 25, 2011. It states, "Of equal importance to MHC is that the funds collected from low-income neighborhoods and/or neighborhoods with concentrations of people in protected categories (as defined for fair housing) are returned to those neighborhoods."

a. Provide the average number of household members per residential account that live in the low-income neighborhoods in the Metro Louisville area.

b. Do the Louisville Gas & Electric Company ("LG&E") customers who live in those neighborhoods qualify to participate in some of all of LG&E's residential DSM and EE programs? Explain.

c. If the answer to questions b. above is that the majority of the LG&E customers do not qualify, explain what prevents them from doing so and what LG&E can do that would assist these customers to qualify.

d. Explain how LG&E can identify whether a customer lives in a low-income neighborhood using the information within its customer accounting system.

3. Refer to page 4 of the MHC Testimony, wherein it is stated, "Most of the homes in Louisville, approximately 240,000, were built before the 1980s when insulation became a requirement in the local building code. About 75,000 of these were built before 1950 and may still have original single pane windows, lighting, and older appliances. Another 165,000 were built before 1979 and the requirement of insulation."

a. Explain whether MHC counsels low-income LG&E customers as to the availability of the various residential DSM/EE programs for which they might qualify.

b. Explain whether MHC assists low-income LG&E customers in identifying energy conservation methods that might help reduce their energy bills.

c. Does MHC have computers available for use by low-income LG&E customers so that they can go online and participate in the online audit in the Residential Conservation program? Explain.

d. Explain whether MHC encourages low-income LG&E customers to request the Compact Fluorescent Light ("CFL") bulbs that are available to be mailed free to their homes.

e. Explain whether MHC encourages the LG&E customers in low-income neighborhoods to participate in the Kentucky Home Performance Program, if they qualify.

f. Explain whether MHC believes LG&E's efforts to communicate and educate LG&E customers about the residential DSM/EE programs that are available are effective in increasing low-income participation. Include in the explanation whether MHC has suggestions for increasing participation.

g. Explain whether MHC refers LG&E customers in the low-income neighborhoods of Metro Louisville to the local community action agencies or community-based organizations to determine whether they might qualify for the WeCare Program? Explain.

4. Refer to page 11 of the MHC Testimony. It states that "The Weatherization stimulus funding is producing a number of people and agencies with the capacity to do energy audits, making the LG&E service called Residential Conservation/Home Energy Performance Program less useful than before. MHC believes new and more innovative services should be offered by LG&E."

a. Provide a description and detail of the energy audits being done using stimulus funding.

b. Identify the persons and agencies performing the energy audits using the stimulus funding.

c. Describe how LG&E can provide more innovative services and whether these services will be part of the DSM/EE programs. Explain.

d. If stimulus funding for weatherization is discontinued at some point in the future, how could funding then be provided for those persons and agencies that are currently performing energy audits using stimulus funding? Explain.

5. Refer to page 11 of the MHC Testimony. "Another concern of MHC is that the Residential Incentive Program proposed by LG&E will not provide benefits to low

and moderate-income homeowners and ratepayers. As proposed, the program will only provide case incentives to those homeowners and landlords that can document the purchase of new energy efficient equipment, HVAC systems, or window films. Yet LG&E is not proposing to provide financing to allow low- and moderate-income ratepayers to make such purchases, nor (as currently proposed), will LG&E reimburse non-profit agencies that purchase such equipment for low-income homeowners.”

a. Does MHC believe that LG&E should provide the necessary financing to low- and moderate-income ratepayers for the purchase of new energy efficient equipment, HVAC systems, or window film?

b. If the answer and explanation to 5.a. is yes, how does MHC propose that LG&E pay for this service, through the residential DSM tariff or as part of the energy charge in base rates borne by all residential ratepayers? Explain.

c. Explain whether MHC knows the average length of time of occupancy of the LG&E residential customers in the low- and moderate-income neighborhoods and, if so, whether the length of time of occupancy by those customers would be sufficient to pay for the financing of new energy efficient equipment, HVAC systems, or window films.

d. Explain whether MHC seeks reimbursement on behalf of the non-profit agencies for the total cost of new energy efficient equipment, HVAC systems, or window films, or if MHC proposes that the non-profit agencies receive the incentives for such equipment for the low- and moderate-income LG&E customers.

e. If the answer to 5.d. is that MHC is seeking reimbursement of the total cost of such equipment, explain how MHC proposes that LG&E pay for this cost

through the residential DSM tariff or as part of the energy charge in base rates borne by all residential ratepayers.

6. Explain how MHC participates in LG&E's Energy Efficiency Advisory Group or its participation, if any, as an invitee to any other meetings to discuss DSM/EE programs. Include in the explanation the frequency of such meetings.

7. Provide a description of MHC's source of funding. What percentage of MHC's funds is used to provide assistance to low-income LG&E customers?



Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED:     **AUG 08 2011**    

cc: Parties of Record

Honorable David Jeffrey Barberie  
Corporate Counsel  
Lexington-Fayette Urban County Government  
Department Of Law  
200 East Main Street  
Lexington, KENTUCKY 40507

Honorable Kendrick R Riggs  
Attorney at Law  
Stoll Keenon Ogden, PLLC  
2000 PNC Plaza  
500 W Jefferson Street  
Louisville, KENTUCKY 40202-2828

Lonnie Bellar  
Vice President, State Regulation & Rates  
LG&E and KU Services Company  
220 West Main Street  
Louisville, KENTUCKY 40202

Honorable Iris G Skidmore  
415 W. Main Street  
Suite 2  
Frankfort, KENTUCKY 40601

David Brown  
Stites & Harbison, PLLC  
1800 Providian Center  
400 West Market Street  
Louisville, KENTUCKY 40202

Allyson K Sturgeon  
Senior Corporate Attorney  
LG&E and KU Services Company  
220 West Main Street  
Louisville, KENTUCKY 40202

Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Utility & Rate  
1024 Capital Center Drive  
Suite 200  
Frankfort, KENTUCKY 40601-8204

Hon. Tom Fitzgerald  
Kentucky Resources Council, Inc.  
PO Box 1070  
Frankfort, KENTUCKY 40602

Rick E Lovekamp  
Manager - Regulatory Affairs  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

Eileen Ordovery  
Legal Aid Society  
416 West Muhammad Ali Boulevard  
Suite 300  
Louisville, KENTUCKY 40202