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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY, METRO HUMAN)
NEEDS ALLIANCE, PEOPLE ORGANIZED)
AND WORKING FOR ENERGY REFORM, AND) CASE NO. 2004 - 304
KENTUCKY ASSOCIATION FOR COMMUNITY)
ACTION, FOR THE ESTABLISHMENT)
OF A HOME ENERGY ASSISTANCE PROGRAM)

DATA REQUEST OF ROBERT L. MADISON

LOUISVILLE GAS AND ELECTRIC COMPANY, METRO HUMAN NEEDS ALLIANCE, PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM AND KENTUCKY ASSOCIATION FOR COMMUNITY ACTION ARE REQUESTED TO ANSWER THE FOLLOWING QUESTIONS. INCLUDE WITH EACH ANSWER THE NAME(S) OF THE PERSON(S) WHO WILL BE RESPONSIBLE FOR THE INFORMATION PROVIDED.

1. PROVIDE THE NAMES OF EACH OF THE COUNTIES IN KENTUCKY THAT LG&E PROVIDES ELECTRIC, GAS OR GAS / ELECTRIC SERVICE.

A. FOR EACH OF THESE COUNTIES LIST THE NUMBER OF:

1. GAS METERS IN EACH COUNTY.
2. ELECTRIC METERS IN EACH COUNTY.
3. COMBINED GAS & ELECTRIC METERS IN EACH COUNTY.
4. GAS HEA ESTIMATED FUNDS PER YEAR.
5. ELECTRIC HEA ESTIMATED FUNDS PER YEAR.
6. COMBINED GAS & ELECTRIC ESTIMATED FUNDS.

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B. ALSO PROVIDE THE TOTAL NUMBERS (FOR METERS AND DOLLARS) FOR EACH COUNTY FOR EACH ITEM IN (A) 1 - 6.

C. PROVIDE THE TOTAL AMOUNTS OF DOLLARS PER YEAR FOR THE LG&E HEA & THE KU GENERATED FROM THE METER CHARGE.

D. DOES LG&E HAS GAS OR ELECTRIC CUSTOMERS THAT ARE ALSO KU CUSTOMERS ? IF YES, LIST THE NUMBER OF CUSTOMERS THAT RECEIVE UTILITY SERVICE FROM BOTH COMPANIES.

2. REFERENCE JOINT APPLICATION (JA), PAGE 15 - 16, ITEM # 28. SINCE KRS 278.170 PROHIBITS CROSS SUBSIDIZING ELECTRIC AND GAS CUSTOMERS AND IN THE PILOT PROGRAM IN CASE 2001 - 323 THERE WAS A GAS / ELECTRIC SUBSIDY EXPLAIN IN DETAIL :

A. HOW THE JOINT APPLICANTS INTEND TO ENSURE THAT ONLY ELECTRIC FUNDS WILL BE USED FOR ELECTRIC PORTIONS OF A HEA AND HOW GAS FUNDS WILL ONLY BE USED FOR GAS PORTIONS OF A HEA.

B. LIST THE REASONS THAT THE PILOT PROGRAM HAD AN ELECTRIC GAS SUBSIDY ? EXPLAIN IN DETAIL.

C. WHAT PARTY OR INDIVIDUALS MADE THE DECISIONS THAT RESULTED IN THE SUBSIDY ? LIST THE NAMES AND ORGANIZATIONS.

D. WHY SHOULD THE PSC ALLOW THE SAME INDIVIDUALS OR PARTIES TO HAVE THE RESPONSIBILITY TO FOLLOW KRS 278.170 AND NOT HAVE A SUBSIDY CONSIDERING THE PAST FAILURE TO FOLLOW THE STATUTE ?

E. ARE THE JOINT APPLICANTS OPPOSED TO FREQUENT REPORTING TO THE PSC RELATED TO GAS / ELECTRIC FUNDS AND SUBSIDIES TO ENSURE THIS DOES NOT HAPPEN AGAIN ?

3. REFERENCE JA, PAGE 5, ITEM # 12. ONE OF THE ELIGIBILITY CRITERIA FOR HEA FUNDS IS GROSS INCOME BELOW 110 % OF THE FEDERAL POVERTY GUIDELINES.

A. CAN A RESIDENTIAL CUSTOMER WHO MEETS THE INCOME GUIDELINES, BUT IS NOT HAVING PROBLEMS PAYING THEIR BILLS, STILL GET HEA FUNDS ? IF YES, EXPLAIN HOW THIS CAN BE JUSTIFIED ?

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B. CAN A RESIDENTIAL CUSTOMER WHO DOES NOT MEET THE INCOME GUIDELINES GET HEA ASSISTANCE ? WHY NOT ? ARE THE JOINT APPLICANTS SAYING THAT THESE INDIVIDUALS DO NOT NEED ASSISTANCE ? EXPLAIN ALL RESPONSES IN DETAIL.

4. LIST THE MEMBERS (ORGANIZATION REPRESENTED AND NAME OF PERSON) OF THE LG&E DSM COLLABORATIVE. LIST THE NAMES OF THE KU DSM (ORGANIZATION REPRESENTED AND NAME OF PERSON) COLLABORATIVE.

A. WHAT IS THE PROCEDURE FOR JOINING THE DSM COLLABORATIVE ?

B. PROVIDE COPIES OF ANY WRITTEN POLICIES OF THE PROCEDURES OF THE DSM COLLABORATIVES.

C. WHICH OF THE JOINT APPLICANTS IN THIS CASE OR MEMBERS OF THE DSM COLLABORATIVE WOULD BE CONSIDERED CUSTOMER REPRESENTATIVES AS DEFINED IN KRS 278.285 (f) (1) ?

1. EXPLAIN IN DETAIL WHY THEY ARE CUSTOMER REPRESENTATIVES.

2. HOW MANY OF THE LG&E RESIDENTIAL CUSTOMERS DO EACH OF THESE CUSTOMER GROUPS REPRESENT ? EXPLAIN HOW THIS NUMBER WAS ARRIVED AT.

3. DESCRIBE THE CUSTOMERS THAT EACH OF THE CUSTOMER REPRESENTATIVES REPRESENTS ?

5. DESCRIBE THE EXTENT THE ATTORNEY GENERALS' OFFICE HAS BEEN INVOLVED IN DEVELOPING THE HEA PLAN IN THE JOINT APPLICATION AS REQUIRED BY KRS 278.285 (f) (1) ?

A. HAS THE ATTORNEY GENERAL APPROVED THIS PLAN ? IF YES, PROVIDE COMPLETE DOCUMENTATION THAT SHOWS THE AG APPROVAL OF THIS PLAN AND THE EXTENT INVOLVED IN DEVELOPING THIS PLAN.

B. REFERENCE JA , PAGE 3, ITEM # 8. FOR EACH MEETING HELD, PROVIDE THE LOCATION AND DURATION OF THE MEETING, THE MEETING DATES, PARTIES REPRESENTED, INDIVIDUALS NAMES OF THOSE REPRESENTATIVES, MINUTES FROM THE MEETINGS AND OR ANY OTHER DOCUMENTATION WHICH SHOWS THE EXTENT OF INVOLVEMENT OF EACH OF THE JOINT APPLICANTS AND THE

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ATTORNEY GENERAL IN DEVELOPING THE PLAN AND THE AMOUNT OF SUPPORT FOR THE PLAN.

C. HOW WERE THE PARTICIPANTS DETERMINED WHO WOULD PARTICIPATE IN THE HEA PLAN DEVELOPMENT ? EXPLAIN IN DETAIL.

D. WAS THERE ANY PUBLIC ANNOUNCEMENT OF THE MEETINGS ? WERE THERE OTHER INTERESTED PARTIES WHO COULD HAVE PARTICIPATED IN THE PLAN DEVELOPMENT ? EXPLAIN IN DETAIL.

E. SEPARATELY FOR EACH OF THE JOINT APPLICANTS (LG&E, MHNA, CAC, AND POWER) AND THE ATTORNEY GENERAL AND SEPARATELY FOR EACH LISTED ITEM BELOW, LIST ON A SCALE FROM 1 - 10, 1 BEING NO SUPPORT, 10 BEING MAXIMUM SUPPORT, THE SUPPORT OF THE FOLLOWING ITEMS IN THE JOINT APPLICATION:

1. REFERENCE JA, PAGE 4, ITEM # 11. AN ANNUAL CASE LOAD OF 900 HOUSEHOLDS.

2. REFERENCE JA, PAGE 5, ITEM # 12, ELIGIBILITY CRITERIA:

A. GROSS INCOME BELOW 110 % OF THE FEDERAL POVERTY GUIDELINES.

B. MINIMUM MONTHLY INCOME OF \$ 100.

C. ARREARAGE OF NO MORE THAN \$ 1000.

D. A UTILITY MATCH OF 50% FOR HEA FUNDS FROM SHAREHOLDERS. (NOTE THIS ITEM IS NOT CONTAINED IN THE JA)

6. IS THE INCOME ELIGIBILITY CRITERIA FOR THE HEA THE SAME AS THE LIHEAP ? IF NO, EXPLAIN THE DIFFERENCE(S) IN DETAIL.

A. DOES THE LIHEAP PROVIDE YEAR ROUND UTILITY ASSISTANCE ? LIST THE MONTHS THE LIHEAP PROVIDES FUNDING.

B. IS THE LIHEAP A WINTER ONLY HEATING ASSISTANCE FUND ?

C. WHY HAVE THE JOINT APPLICANTS DECIDED TO USE THE LIHEAP (WINTER ONLY - HEATING ONLY) INCOME ELIGIBILITY CRITERIA FOR THE LG&E HEA

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(YEAR ROUND HEATING AND COOLING) ENERGY ASSISTANCE PLAN ? EXPLAIN IN DETAIL.

D. SINCE THERE MAY BE LG&E CUSTOMERS THAT MAY NEED UTILITY ASSISTANCE THAT DO NOT MEET THE ELIGIBILITY CRITERIA, THE CURRENT LIHEAP CLIENTS ARE ELIGIBLE FOR ASSISTANCE FROM MULTIPLE SOURCES, HOW IS THE JA FAIR TO THE RESIDENTIAL CUSTOMERS AS A WHOLE ? EXPLAIN IN DETAIL.

7. ARE THERE ANY MONTHLY, YEARLY, OR LIFETIME LIMIT TO LG&E HEA RECEIPIENTS IN HEA PLAN ? IF YES DESCRIBE THE LIMITS. IF NO, EXPLAIN WHY NOT.

A. IF THE LG&E HEA DESIGNED TO BE A LONG TERM UNLIMITED WELFARE ENTITLEMENT ? EXPLAIN THE ANSWER IN DETAIL.

8. FOR THE FOLLOWING THREE EXAMPLES, FOR THE PAST 12 MONTHS THAT WEATHER DATA IS AVAILABLE, PROVIDE THE MONTHLY HEA DOLLAR ASSISTANCE THAT HEA RECEIPIENTS WOULD HAVE RE RECEIVED. ASSUME ALL THREE HAVE THE MAXIMUM INCOME UNDER THE THE ELIGIBILITY CRITERIA AS PROPOSED IN THE JA.

A. ONE PERSON HOUSEHOLD. ANNUAL UTILITY BILL \$ 1,000.

B. TWO PERSON HOUSEHOLD. ANNUAL UTILITY BILL \$1,400.

C. THREE PERSON HOUSEHOLD. ANNUAL UTILITY BILL \$1,800.

9. HOW DOES THE PROPOSED HEA DEAL WITH CLIENTS THAT USE RELATIVELY MORE ENERY BY KEEPING THEIR THERMOSTATS SET AT A HIGHER LEVEL THAN THOSE THAT TRY TO CONSERVE ENERGY ? EXPLAIN IN DETAIL HOW THE HEA ADDRESSES THIS ISSUE.

10. REFERENCE JA, PAGE 5, ITEM # 12, SUBSECTION 6, CONCERNING ELIGIBILITY CRITERIA THAT HEA RECEIPIENTS MUST NOT LIVE IN A MULTI - UNIT SINGLE METER DWELLING.

A. IS IT POSSIBLE THAT A LOW INCOME LG&E CUSTOMER COULD LIVE IN A MULTI - UNIT INDIVIDUAL METER DWELLING THAT WOULD BE PAYING A COMMERCIAL RATE ? IF YES, EXPLAIN HOW A COMMERCIAL CUSTOMER

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COULD RECEIVE A HEA BENEFIT PAID FOR BY RESIDENTIAL CUSTOMERS.

B. EXPLAIN THE STEPS IN THE JA TO ENSURE THAT HEA RECEIPTS ARE RESIDENTIAL CUSTOMERS AND NOT COMMERCIAL CUSTOMERS.

11. WHAT ARE THE JOINT APPLICANTS PROPOSING AS THE NAME ON THE LINE ITEM CHARGE ON RESIDENTIAL CUSTOMERS BILLS FOR THE HEA CHARGE ?

A. WOULD THE JOINT APPLICANTS OBJECT TO THE FOLLOWING TITLE : LOW INCOME ASSISTANCE ? IF YES, EXPLAIN IN DETAIL THE REASON(S) FOR THE OBJECTION.

12. WAS THE ISSUE OF UTILITY MATCH FROM SHAREHOLDERS ADDRESSED IN THE SETTLEMENT AGREEMENT (SA) FROM CASE 2003 -00433 ? EXPLAIN THE RESPONSE AND REFER TO THE SPECIFIC PORTIONS OF THE SA THAT ADDRESS THE SAID ISSUE.

A. SEPARATELY FOR EACH OF THE PAST FIVE YEARS LG&E SHOULD PROVIDE THE AMOUNT OF MATCH (TOTAL DOLLAR AND PERCENTAGE) THEY HAVE PROVIDED IN THE WINTERHELP PROGRAM.

B. SINCE LG&E HAS AGREED TO MATCH VOLUNTARY CONTRIBUTIONS TO THE WINTERHELP PROGRAM, WHAT IS LG&E 'S POSITION ON MATCHING CUSTOMERS FUNDS WITH SHAREHOLDERS DOLLARS IN THE LG&E HEA ? EXPLAIN IN DETAIL.

13. HOW DO THE JOINT APPLICANTS INTEND ON ADMINISTERING THE PLAN ?

A. PREVIOUSLY A CONSULTATIVE BOARD WAS PROPOSED. DESCRIBE THE MEMBERS OF THE JOINT APPLICANTS THAT WILL HAVE A REPRESENTATIVE TO ADMINISTER THE HEA AND THE NAMES OF THOSE REPRESENTATIVES.

B. DESCRIBE HOW ADMINISTRATIVE DECISIONS WILL BE MADE ON ISSUES RELATED TO THE HEA.

14. MHNA, POWER, AND CAC, PROVIDE BACKGROUND ON YOUR ORGANIZATION INCLUDING :

A. THE NUMBER OF MEMBERS.

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B. NUMBER OF EMPLOYEES.

C. ANNUAL BUDGET. PROVIDE THE SOURCES OF AND DOLLAR AMOUNTS OF FUNDS FOR THE MOST RECENT YEAR.

D. NUMBER OF YEARS IN LG&E TERRITORY.

E. NAMES AND EMPLOYMENT AFFILIATION OF YOUR BOARD OF DIRECTORS (OR EQUIVALENT).

G. PROVIDE A COPY OF THE MOST RECENT ANNUAL REPORT.

15. PROVIDE THE LIHEAP DEFINITION OF INCOME. EXPLAIN ITEMS THAT ARE INCLUDED OR EXCLUDED. WILL THE LG&E HEA USE THE SAME DEFINITION OF INCOME ? PROVIDE THE LG&E HEA DEFINITION OF INCOME.

16. REFERENCE JA, PAGE 7, ITEM # 16, SUBSECTION 5, CONCERNING ADJUSTMENT OF THOSE WHOSE PRIMARY INCOME IS TAXES TO COUNTER THE IMPACT OF TAXES.

A. EXPLAIN HOW THIS IS ACCOMPLISHED.

B. PROVIDE THE FORMULA THAT IS USED IN THE CALCULATION. EXPLAIN THE VARIABLES USED.

C. COMPARE A HEA RECIPIENT THAT HAS NO EARNED INCOME VERSUS A HEA RECIPIENT WHO HAS ONLY EARNED INCOME. SHOW A HOUSEHOLD OF 1, 2, AND 3 AND SHOW THE MAXIMUM DOLLAR AMOUNT THAT A WAGE EARNER CAN EARN AND STILL BE ELIGIBLE FOR THE HEA. SHOW A HOUSEHOLD OF 1, 2, AND 3 AND SHOW THE MAXIMUM DOLLAR AMOUNT THAT A RESIDENTIAL CUSTOMER WITH ALL UNEARNED INCOME CAN HAVE AND STILL BE ELIGIBLE FOR THE HEA. PROVIDE THE WORK PAPERS AND CALCULATIONS.

17. PROVIDE SEPARATE DEMOGRAPHIC DATA ON THE LOW INCOME IN THE LG&E SERVICE TERRITORY FOR THE PERCENTAGE OF HEAD OF HOUSEHOLD THAT IS MALE, FEMALE, WHITE, BLACK, HISPANIC, ELDERLY, MARRIED, SINGLE OR DIVORCED.

18. EXPLAIN IN DETAIL HOW THE RECIPIENTS OF THE HEAP WILL BE CHOSEN IF THERE ARE MORE APPLICANTS THAN FUNDS. WHAT CRITERIA WILL BE USED

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TO MAKE THE DECISION ?

19. RELATED TO THE PILOT PROGRAM IN CASE 2001 - 323, FOR EACH HEA RECIPIENT RESPONSIBLE FOR THE BILL :

A. PROVIDE THE NAME, ADDRESS, TOTAL ELECTRIC DOLLAR AMOUNTS, TOTAL GAS DOLLAR AMOUNTS AND TOTAL PAYMENT TO ARREARAGES THAT WERE PROVIDED TO EACH HEA RECIPIENT.

B. PROVIDE FOR EACH SEPARATE CATEGORY, THE PERCENTAGE OF WHITES, AFRICAN AMERICANS, HISPANICS, ASIAN, MIXED RACE, ETC. THAT WERE PROVIDED WITH HEA ASSISTANCE.

C. PROVIDE THE PERCENTAGE OF MEN AND WOMEN THAT WERE PROVIDED WITH HEA ASSISTANCE.

D. PROVIDE THE PERCENTAGE OF MARRIED, SINGLE , DIVORCED THAT WERE PROVIDED WITH HEA ASSISTANCE.

E. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT WERE RESIDENTIAL CUSTOMERS OF LG&E.

F. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT WERE COMMERCIAL CUSTOMERS OF LG&E.

G. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT WERE RECEIVING SOCIAL SECURITY.

H. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT ARE HANDICAPPED.

I. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT WERE HIGH SCHOOL GRADUATES.

J. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT HAD FOUR YEAR COLLEGE DEGREES.

K. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT WERE MILITARY VETERANS.

L. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT OWNED THEIR OWN

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HOUSE.

M. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT RENTED A HOUSE.

N. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT LIVED IN AN APARTMENT.

O. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT RECEIVED CHILD SUPPORT PAYMENTS.

P. PROVIDE THE PERCENTAGE OF HEA RECIPIENTS THAT HAVE EARNED WAGES.

20. FOR EACH OF THE COUNTIES IN THE LG&E SERVICE TERRITORY LIST THE NAME OF THE ENTITY THAT WILL PROVIDE HEA ASSISTANCE. (MHNA, AEP, CAC, KACA, ETC.)

A. IN THE PILOT HEA, LIST THE NAME OF THE ENTITY THAT ADMINISTERED THE HEA FOR EACH SPECIFIC COUNTY.

B. FOR EACH SPECIFIC HEA ADMINISTRATOR IN THE HEA PILOT PROVIDE THE TOTAL DOLLAR AMOUNT THAT THAT ENTITY WAS RESPONSIBLE FOR SPENDING. (MHNA, CAC, ETC.)

C. FOR THE HEA PILOT, PROVIDE THE TOTAL AMOUNT OF FUNDS SPENT IN EACH COUNTY OF THE LG&E SERVICE TERRITORY.

D. FOR THE HEA PILOT, PROVIDE THE TOTAL AMOUNT OF ELECTRIC FUNDS SPENT IN EACH COUNTY OF THE LG&E SERVICE TERRITORY.

E. FOR THE HEA PILOT, PROVIDE THE TOTAL AMOUNT OF GAS FUNDS SPENT IN EACH COUNTY OF THE LG&E SERVICE TERRITORY.

21. WHAT IS THE PROPOSED DOLLAR AMOUNT FOR EACH YEAR OF THE HEA TO BE SPENT IN EACH OF THE COUNTIES IN THE LG&E SERVICE TERRITORY ?

A. HOW WAS THIS NUMBER ARRIVED AT ? PROVIDE CALCULATIONS AND WORK PAPERS.

22. PROVIDE THE NAMES OF THE EACH OF THE VARIOUS SOURCES OF UTILITY

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ASSISTANCE AND THE TOTAL FUNDS FOR 2002 AND 2003 IN THE LG&E SERVICE TERRITORY. INCLUDE LIHEAP, METRO UNITED WAY, FEDERAL GOVERNMENT, STATE GOVERNMENT, LOCAL GOVERNMENT, COUNTY GOVERNMENT, WINTER HELP, CAA, CAC, MHNA, AEP, CHURCHES, ETC.

23 . REFERENCE JA, PAGE 8, ITEM # 20 CONCERNING MHNA REPRESENTS 34 SOCIAL SERVICE ORGANIZATIONS SERVING LOW - INCOME HOUSEHOLDS. PROVIDE A LISTING OF ALL THE ORGANIZATIONS THAT ARE MEMBERS OF THE MHNA. PROVIDE A LIST OF ORGANIZATIONS THAT MHNA REPRESENTS.

A. PROVIDE A LIST OF THE MINISTRY PROVIDERS.

B. IS MHNA A RELIGIOUS BASED ORGANIZATION ? EXPLAIN IN DETAIL.

C. DO HEA RECEIPIENTS HAVE TO ATTEND A CHURCH IN THE ORGANIZATION THAT MHNA REPRESENTS TO RECEIVE HEA ASSISTANCE ? EXPLAIN IN DETAIL.

D. EXPLAIN THE LEGALITY OF THE STATE OF KENTUCKY APPROVING A HEA THAT WILL BE ADMINISTERED BY A RELIGIOUS ORGANIZATION.

E. EXPLAIN IN DETAIL THE LEGALITY OF THE STATE APPROVING A RELIGIOUS ORGANIZATION ADMINISTERING FUNDS CONSIDERING THE FEDERAL AND STATE CONSTITUTIONAL SEPARATION OF STATE AND RELIGION.

24. WHAT ROLE DOES THE LOUISVILLE URBAN LEAGUE HAVE IN THE PROPOSED HEA ? EXPLAIN IN DETAIL.

25. PROVIDE FOR EACH OF THE PAST 5 YEARS THE DOLLAR COST TO LG&E OF COLLECTING, NOTIFYING, DISCONNECTING AND RECONNECTING LOW INCOME CUSTOMERS BECAUSE OF PAYMENT PROBLEMS.

A. PROVIDE FOR EACH OF THE NEXT 5 YEARS, UNDER THE PROPOSED HEAP, THE PROJECTED OR ESTIMATED DOLLAR SAVINGS RELATED TO REDUCED COLLECTION, NOTIFYING, DISCONNECTING AND RECONNECTING LOW INCOME CUSTOMERS. PROVIDE WORK PAPERS AND CALCULATIONS.

26. PROVIDE COPIES OF ALL DOCUMENTATION, LETTERS, ELECTRONIC MAIL, ETC. RECEIVED BY LG&E CONCERNING THE PILOT HEA FROM RESIDENTIAL CUSTOMERS.

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27. PROVIDE THE NAMES AND RESUMES OF THE INDIVIDUALS WHO ARE RESPONDING TO THE DATA REQUESTS.

28. FOR EACH YEAR IN 2002 AND 2003 PROVIDE SEPARATELY THE DOLLAR AMOUNTS OF THE LIHEAP FUNDS PROVIDED TO THE LG&E SERVICE TERRITORY. DESCRIBE THE TREND OF INCREASING, THE SAME OR DECREASING FUNDING.

29. REFERENCE JA, PAGE 10, ITEM # 22 :

A. PROVIDE A SAMPLE COPY OF THE RELEASE OF INFORMATION.

B. PROVIDE A SAMPLE COPY OF THE SERVICE AGREEMENT.

30. REFERENCE JA, PAGE 10, ITEM # 24 :

A. LIST THE NUMBER OF EMPLOYEES OF AEC, THEIR TITLES, THEIR NAMES, THEIR ANNUAL SALARY AND COMPENSATIONS COSTS.

31. REFERENCE JA, PAGE 4, ITEM # 11, WHICH STATES THE GOAL FOR ASAP PARTICIPATION IS 900 HOUSEHOLDS WITH AN ATTRITION RATE BETWEEN 1 - 2 PERCENT, ANTICIPATING 1640 HOUSEHOLDS SERVED OVER THREE YEARS. EXPLAIN HOW THESE NUMBERS WERE ARRIVED AT. PROVIDE WORK PAPERS AND CALCULATIONS.

32. REFERENCE JOINT APPLICATION OF KENTUCKY UTILITIES IN CASE 2004 - 303 (KUJA) PAGE 3, ITEM # 9, RELATED TO THE PROGRAM IS EXPECTED TO SERVE 1,300 LOW - INCOME CUSTOMERS.

REFERENCE JA, PAGE 4, ITEM # 11, CONCERNING THE GOAL FOR PARTICIPATION IS 900 HOUSEHOLDS.

A. EXPLAIN IN DETAIL HOW THE LG&E HEA IS BETTER THAN THE KU HEA WHEN THE KU HEA WILL SERVE 44% MORE RESIDENTIAL CUSTOMERS WITH LESS FUNDING THAN THE LG&E HEA.

B. ISN'T A HEA THAT SERVES MORE HOUSEHOLDS A BETTER PLAN FOR THE COMMUNITY ? EXPLAIN IN DETAIL.

C. SHOULD THE PSC MODIFY THE LG&E HEA SO THAT IT HAS SIMILAR PARAMETERS TO THE KU HEA RESULTING IN MORE CUSTOMERS RECEIVING

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HELP ? EXPLAIN IN DETAIL.

33. REFERENCE KU JA, PAGE 4, ITEM # 11, CONCERNING THE SUBSIDY BENEFIT OF 42 DOLLARS PER MONTH, NOT TO EXCEED 294 DOLLARS PER YEAR.

A. WHAT IS THE MAXIMUM MONTHLY BENEFIT FOR THE LG&E HEA ?

B. WHAT IS THE MAXIMUM YEARLY BENEFIT FOR THE LG&E HEA ?

C. IS THE KU LG&E MUCH SIMPLER TO ADMINISTER THAT THE COMPLICATED LG&E HEA ? SHOULD THE PSC APPROVE A LG&E HEA WITH A FIXED MONTHLY AND YEARLY BENEFIT LIKE THE KU HEA ? EXPLAIN ALL RESPONSES IN DETAIL.

34. REFERENCE JA, PAGES 14 - 15, ITEM # 27 WHICH RELATED TO THE ASAP PROGRAM MAINTAINING DATA ON DEMOGRAPHICS. LIST ALL THE DEMOGRAPHICS THAT THE DATA CONTAINS. WOULD THE JOINT APPLICANTS OBJECT TO ALL DEMOGRAPHICS BEING REPORTED TO THE PSC IN AN ANNUAL REPORT ? EXPLAIN ALL RESPONSES.

I CERTIFY THAT ON 07 SEP 2004, COPIES OF THIS DATA REQUEST WERE SENT, REGULAR MAIL, AND ELECTRONIC MAIL, TO ALL PARTIES OF RECORD.

SINCERELY,



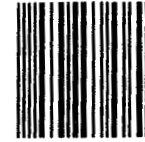
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