

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY FOR AN ORDER )  
APPROVING A RESPONSIVE PRICING )  
AND SMART METERING PILOT )  
PROGRAM )

Case No. 2007-00117

**SUPPLEMENTAL REQUEST FOR INFORMATION  
POSED BY THE ATTORNEY GENERAL**

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Supplemental Request for Information to Louisville Gas and Electric Company, to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from the Office of Attorney General.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

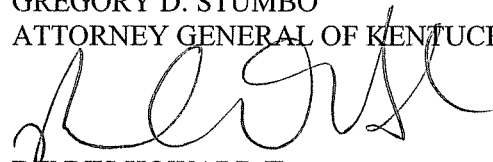
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO  
ATTORNEY GENERAL OF KENTUCKY



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CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 30<sup>th</sup> day of April, 2007, I have filed the original and ten copies of the foregoing Attorney General's Supplemental Request for Information with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

Honorable Allyson K. Sturgeon  
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220 West Main Street  
Louisville, Kentucky 40202

Hon Kendrick R. Riggs  
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2000 PNC Plaza  
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Honorable Michael L. Kurtz  
Boehm, Kurtz & Lowry  
36 East Seventh Street  
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Cincinnati, OH 45202



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Assistant Attorney General

**REQUEST FOR INFORMATION**  
**Case No. 2007-00117**

1. Please reference Response of LG&E to the Attorney General's Request for information, Blake Response to Question No.3, Page 1. Confirm that 2008 (a "leap" year) has an additional Six (6) hours of P1 rate use, Fifteen (15) hours of P2 rate use and Three (3) hours of P3 rate use for both RS and GS rates, and if the above hours are correct, please explain the variance from the hours listed for each rate in the Application, Blake Testimony, Exhibits KWB-1 and KWB-2. (This should be read as a request to confirm whether February 29, 2008, the "leap" day and a weekday, should follow other weekday usages listed in the application for the same seasonal time period, which provide for Ten (10) hours of P1 rate use, Ten (10) hours of P2 rate use and Three (3) hours of P3 rate use.)
  
2. Please outline what steps have been, or will be, taken by LG& E in regard to network security to ensure that the data and control functions of the devices installed in participants homes are protected from unauthorized access.
  
3. Please reference the Application, page 4, paragraph 9. Confirm whether the Eighty (80) hours of critical peak pricing represent a fixed quantity of hours to be billed yearly or whether the critical peak hours may vary, with a maximum to be billed of no more than Eighty (80) hours per year.

4. Please reference Response of LG&E to the Attorney General's Request for information, Blake Response to Question No.17, Page 2.

A. Please confirm that the critical peak hours for 2003 totaled 37 hours; for 2004 totaled 25 hours; for 2005 totaled 64 hours; and for 2006 totaled 39 hours.

B. If the historical data concerning the Company's critical peak events is correct, then please provide specifics as to the Company's reasoning for using Eighty (80) hours of critical peak hours in this pilot program rather than an average of the previous years' critical peak hours of 41.25 hours or the recent historical maximum of 64 hours.

5. Please reference the Application, page 4, paragraph 9 and Blake Testimony, Exhibit KWB-1 and KWB-2.

A. Please provide specifics as to the Company's reasoning for the provision of a critical peak (P4) price in this program.

B. Has the Company considered using only the high demand (P3) rate during critical peaks events and eliminating the critical peak (P4) rate? If no, then why not?

C. Please provide specifics as to the Company's reasoning for using a critical peak (P4) rate of \$0.30107 per kWh. Was any other critical peak rate (P4) considered?

If other rates for critical peak events were considered, what were those rates?

Why did the Company choose its proposed (P4) rate?

- D. As the critical peak (P4) rate is Five (5) times the current (non-pilot program) rate and nearly Eight (8) times the lowest (P1) price proposed under this pilot program, does the Company consider this a necessary component of the program to ensure a favorable participant response to the pricing signal? (i.e. the lowering the participants' demand during critical peak events). Why?
- E. Does the Company believe it is possible to obtain the same favorable response through a lower critical peak rate? If no, then why not? If so, then why was the lower critical peak (P4) rate not proposed?
- F. Please reference Response of LG&E to the Attorney General's Request for information, Blake Response to Question No.17, Page 2. Since historically the critical peaks occur in the early afternoon, when participants may not be at home, does the Company believe that the higher critical peak (P4) rate will have the effect of lowering of the participants' demand during critical peak events?
6. Please describe the options which participants may have in the event that their billing under this program exceeds their billing under the non-program tariff. Will LG&E offer payment assistance should a participants bill under the pilot program greatly exceed that under the non-program tariff?

7. Please provide typical class load profiles (in kWh) for the calendar year 2003 for both RS and GS ratepayers. For the requested data, please provide the hourly load data at each of the proposed tariffs along with a monthly total for each month.

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