Teresa J. Hill, Secretary Environmental and Public Protection Cabinet

Timothy J. LeDonne Commissioner Department of Public Protection

Lonnie E. Bellar E.ON U.S. Services, Inc. 220 West Main Street Louisville, KY 40202



Commonwealth of Kentucky Public Service Commission 211 Sower Blvd. P.O. Box 615 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov

September 21, 2007

Mark David Goss Chairman

> John W. Clay Vice Chairman

Caroline Pitt Clark Commissioner

RE: Case No. 2007-00319

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

Beth O'Donnell Executive Director



Teresa J. Hill, Secretary Environmental and Public Protection Cabinet

Timothy J. LeDonne Commissioner Department of Public Protection

Joe F. Childers Getty & Childers 1900 Lexington Financial Center 250 West Main Street Lexington, KY 40507



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## September 21, 2007

Honorable Dennis G. Howard II Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204 Mark David Goss Chairman

> John W. Clay Vice Chairman

Caroline Pitt Clark Commissioner

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Timothy J. LeDonne Commissioner Department of Public Protection

Honorable Michael L. Kurtz Attorney at Law Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OH 45202



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Rick E. Lovekamp Manager - Regulatory Affairs E.ON U.S. Services, Inc. 220 West Main Street Louisville, KY 40202



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Honorable Allyson K. Sturgeon Attorney at Law E.ON U.S. Services, Inc. 220 West Main Street Louisville, KY 40202



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## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE JOINT APPLICATION OF LOUISVILLE ) GAS AND ELECTRIC COMPANY AND ) KENTUCKY UTILITIES COMPANY DEMAND- ) SIDE MANAGEMENT FOR THE REVIEW, ) CASE NO. 2007-00319 MODIFICATION, AND CONTINUATION OF ) ENERGY EFFICIENCY PROGRAMS AND ) COST RECOVERY MECHANISMS )

## SECOND DATA REQUEST OF COMMISSION STAFF TO LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU"), pursuant to 807 KAR 5:001, are to file with the Commission the original and 7 copies of the following information, with a copy to all parties of record. The information requested herein is due October 5, 2007. 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. LG&E and KU shall make timely amendment to any prior responses if they obtain 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 LG&E and KU fail or refuse to furnish all or part of the requested information, LG&E and KU shall provide a written explanation of the specific grounds for their 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to the last page of the application.

a. The companies propose to modify the calculation of the incentive to employ the method used for the Education and Load Control programs. Provide an example of what the incentive would be under the existing method and under the proposed new methodology for a program other than Education and Load Control.

b. Explain why LG&E and KU chose to adopt the methodology from the Education and Load Control programs for all the programs rather than adopting the methodology from the other programs for the Education and Load Control programs.

Beth O'Donnell Executive Director Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602

Dated: September 21, 2007

Cc: Parties of Record