## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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AN INVESTIGATION OF THE	)	
ENERGY AND REGULATORY	)	ADMINISTRATIVE
ISSUES IN SECTION 50 OF	)	CASE NO. 2007-00477
KENTUCKY'S 2007 ENERGY ACT	)	

FIRST DATA REQUEST OF COMMISSION STAFF TO KENTUCKY ASSOCIATION FOR COMMUNITY ACTION, INC. AND COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC.

Kentucky Association for Community Action, Inc. and Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. ("KACA/CAC"), pursuant to 807 KAR 5:001, are 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 March 20, 2008. 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.

KACA/CAC 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 KACA/CAC fail or refuse to furnish all or part of the requested information, they 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.

- 1. Refer to the Testimony of Thomas "Kip" Bowmar at pages 5 and 6. Mr. Bowmar recommends offering low-income discounts and describes the associated benefits.
- a. What discount rate or level of discount does Mr. Bowmar recommend?
- b. Should the discount rate or level of discount vary based on the customer's past level of consumption or type of fuel used for heating?
- c. Should the cost of the low-income discount be recovered from all customer classes since the purchase of higher priced renewable energy equally benefits all customer classes? Explain your answer.
- d. Would providing such a discount result in more or less energy consumption by those receiving the discount? Explain your response.

- 2. Refer to page 6 of the Testimony of Thomas "Kip" Bowmar. Expand on the recommendation of piggybacking the federal weatherization program.
- a. Does Mr. Bowmar foresee having utility-sponsored weatherization programs targeting only low-income customers or, more broadly, targeting all residential customers?
- b. Explain whether the scope and expected benefits of such a DSM program have been investigated. If so, describe the costs and expected benefits.

Beth O'Donnell

**Executive Director** 

**Public Service Commission** 

P.O. Box 615

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DATED: March 11, 2008

cc: Parties of Record