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JACK B. BATES

IRIS G. SKIDMORE

### Via Hand-Delivery

June 2, 2011

**RECEIVED** 

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Blvd. Frankfort, KY 40601

JUN **02** 2011

PUBLIC SERVICE COMMISSION

Re:

Case No. 2011-00134: The Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Existing, and Addition of New Demand-Side Management and Energy-Efficiency Programs

Dear Mr. Derouen:

Enclosed for filing in the above styled action are an original and ten copies of Initial Interrogatories on Behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. to Joint Applicants.

Sincerely,

Iris G. Skidmore

Enclosure

## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 02 2011

In the Matter of:

PUBLIC SERVICE COMMISSION

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

# INITIAL INTERROGATORIES ON BEHALF OF CAC TO JOINT APPLICANTS LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

\* \* \* \* \*

Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and submits the following Initial Interrogatories to Joint Applicants Louisville Gas and Electric Company and Kentucky Utilities Company (hereinafter collectively "Companies"):

### **INSTRUCTIONS**

In your responses to each question, please identify the witness(es) answering each question. These questions shall be answered by the Companies collectively. However, if any answer to any question differs in any manner between the Companies, please specify how the answer differs.

### **INTERROGATORIES**

1. On Page 9, paragraph 14 of the Joint Application, the Companies project the monthly bill impacts of the new DSM/EE programs and enhancements for residential customers using 1,000 kWh per month. Is the actual average monthly residential usage 1,000 kWh? If not,

what is the average monthly usage in kWh of the Companies' residential customers? Based on

the actual average monthly usage, what is the current DSM/EE charge for these customers and

what will be the new charge for each of the Companies.

2. Please describe the intake process by which eligible customers are identified,

eligibility confirmed, and customers enrolled in the WeCare low-income residential

weatherization program.

3. Please describe who will conduct the installation of weatherization measures for

the WeCare low-income residential weatherization program. What are the qualifications of those

vendors and how will the Companies ensure quality work?

4. How will low-income customers, who lack the up-front capital to make large

purchases, benefit from the Residential Incentives Program? What solutions have the Companies

considered for low-income customers who lack the up front capital to make large purchases?

5. What is the Companies' position regarding waiver in the Smart Energy Profile

program of customer costs for low-income customers, such as those customers already deemed

eligible for the WeCare program?

Respectfully submitted,

IRÍS G. SKIDMORE

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COUNSEL FOR CAC

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2011, a true and accurate copy of the foregoing Initial Interrogatories on Behalf of CAC to Joint Applicants was served by United States mail, postage prepaid, to the following:

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

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

Kendrick R. Riggs, Esq. Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W. Jefferson Street Louisville, KY 40202-2828

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

David Jeffrey Barberie, Esq. Lexington-Fayette Urban County Government 200 East Main Street Lexington, KY 40507

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Tom Fitzgerald, Esq. Kentucky Resources Council, Inc. P.O. Box 1070 Frankfort, KY 40602 Eileen L. Ordover, Esq. Lisa Kilkelly, Esq. Legal Aid Society, Inc. 416 West Muhammad Ali Blvd., Suite 300 Louisville, KY 40202

David Brown, Esq. Stites & Harbison, PPLC 1800 Providian Center 400 West Market Street Louisville, KY 40202

Counsel for CAC