COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE TARIFF FILING OF BIG RIVERS ELECTRIC)
CORPORATION TO REVISE AND IMPLEMENT) CASE NO. 2015-00118
DEMAND-SIDE MANAGEMENT PROGRAMS)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO BIG RIVERS ELECTRIC CORPORATION

Big Rivers Electric Corporation ("Big Rivers"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. 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 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.

Big Rivers shall make timely amendment to any prior response if it obtains 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 Big Rivers fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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 filing a document containing personal information, Big Rivers shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

- 1. Refer to the March 20, 2015 cover letter Big Rivers filed along with its revised demand-side management ("DSM") tariff sheets that states, "The new tariff sheets (Sheet Nos. 23.01 through 23.04) reflect the addition of the new DSM program, DSM-13 Residential Weatherization A La Carte Program."
- a. Explain why this new proposed program cannot be incorporated into the existing DSM-05 Residential Weatherization Program or DSM-10 Residential Weatherization Program Primary Heating Source Non-Electric.
- b. Explain whether there is any income threshold for participation for the DSM-13 Residential Weatherization A La Carte Program.
- c. Explain whether the DSM-13 Residential Weatherization A La Carte Program includes both electric and non-electric heating source customers.
- d. Explain whether there is a maximum amount that can be spent per program participant.

- e. Explain why a member cannot participate in both the DSM-05 Residential Weatherization Program and the DSM-13 Residential Weatherization A La Carte Program.
- f. Explain why a member cannot participate in both the DSM-10 Residential Weatherization Program Primary Heat Source Non-Electric and the DSM-13 Residential Weatherization A La Carte Program.
- 2. Refer to tariff page P.S.C. KY No. 27, Original, Sheet No. 2.01, Current Programs General that states, "Big Rivers funding obligation for the above programs shall not exceed \$1.0 million dollars for each program year."
- a. Provide, by year and by DSM program, the expenditures for 2013 and 2014.
 - b. Provide, by DSM program, the projected expenditures for 2015.
- c. Explain what is proposed to occur if the DSM program expenditures either exceed or are under \$1.0 million.
- 3. Refer to tariff page P.S.C. KY No. 27, First Revised, Sheet No. 20, Cancelling P.S.C. KY No. 27, Original Sheet No. 20. Explain why, for paragraph 7, the "[T]" is red and not black.
- 4. a. Explain why the language in the tariffs for member incentives was changed from a fixed amount to an "up to" amount.
- b. Explain, by program and measure, how any lesser amount of incentive per member is proposed to be determined based on the language change.

Jeff DeRouen for

Executive Director

Public Service Commission

P.O. Box 615

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DATED MAY 2 9 2015

cc: Parties of Record

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