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COMMISSION



Mr. Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

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October 31, 2011

Re: *The Application of PPL Corporation, E.ON AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company and Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of Utilities*
Case No. 2010-00204

Dear Mr. DeRouen:

Pursuant to the Commission's Order of September 30, 2010, in the above-referenced proceeding, Ordering Paragraph No. 3, Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") hereby file a report describing and summarizing the effectiveness of all demand-side management programs which PPL entities have implemented in other jurisdictions that differ from the programs offered by LG&E and KU to their Kentucky customers.

Please place the file stamp of your Office on the enclosed additional copy of this notice and return it in the envelope provided.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Rick E. Lovekamp

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**JOINT APPLICATION OF PPL CORPORATION, E.ON AG,
E.ON US INVESTMENTS CORP., E.ON U.S. LLC,
LOUISVILLE GAS AND ELECTRIC COMPANY, AND
KENTUCKY UTILITIES COMPANY FOR APPROVAL OF
AN ACQUISITION OF OWNERSHIP AND CONTROL OF
UTILITIES**

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CASE NO. 2010-00204

**PPL CORPORATION AND
LOUISVILLE GAS AND ELECTRIC COMPANY / KENTUCKY UTILITIES COMPANY
DSM / ENERGY EFFICIENCY COMPARATIVE**

Filed: October 31, 2011

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INTRODUCTION

On May 28, 2010, PPL Corporation, E.ON AG (“E.ON”), E.ON US Investments Corp. (“E.ON Investments”), E.ON U.S. LLC (“E.ON US”), Louisville Gas and Electric Company (“LG&E”), and Kentucky Utilities Company (“KU”) tendered for filing a joint application pursuant to KRS 278.020(5) and 278.020(6) for approval of the transfer of ownership and control of E.ON US and, by extension, LG&E and KU to PPL Corporation in accordance with terms of an April 28, 2010 Purchase and Sale Agreement. The minimum filing requirements were satisfied on June 2, 2010 and the joint application was accepted as filed on that date.

In its final order approving the change of control (Case No. 2010-00204), the Kentucky Public Service Commission (“Commission”) states “...because of our belief that DSM, energy efficiency, and conservation will continue to increase in importance over time, we are extremely interested in remaining apprised of all such programs which PPL [Corporation] affiliates have implemented in other jurisdictions. For that reason, we will establish a requirement for PPL [Corporation], LG&E, and KU to file a report with the Commission annually which describes and summarizes the effectiveness of all such retail programs that are offered by a PPL [Corporation] affiliate in other jurisdictions but are not offered by LG&E and KU.” Ordering Paragraph No. 3 of the Order establishes that reporting requirement.

In response to the reporting requirement set forth in the Commission’s Order, PPL Corporation, LG&E, and KU present the following: (1) a comparative of offerings between the Companies¹; (2) a description of existing DSM programs for PPL Electric Utilities Corporation (“PPL”), LG&E, and KU; (3) a description of the varying regulatory structures between PPL, LG&E, and KU; and (4) a historical perspective of DSM initiatives for PPL, LG&E, and KU.

1.0: Comparative of Offerings between PPL, LG&E and KU

PPL Program Name	LG&E and KU Comparative Program
Compact Florescent Lighting Program	Residential High Efficiency Lighting Program
Energy Star® New Homes Program	Residential New Construction Program
HVAC Tune-Up Program	Residential and Commercial HVAC Diagnostic and Tune-Up Programs
Direct Load Control Program and Load Curtailment	Residential and Commercial Load Management
Energy-Efficient Behavior and Education	Customer Education and Public Information
Appliance Recycling Program	Residential Refrigerator Removal Program
Commercial and Industrial Customer Incentive Program	Commercial Conservation Program

¹ This being the initial report issued by PPL, LG&E, and KU the Companies are providing a comparative and details of all DSM/EE programs. Future reports provided by the Companies will provide information relating to retail programs that are offered by a PPL affiliate in other jurisdictions but are not offered by LG&E and KU.

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PPL Program Name	LG&E and KU Comparative Program
Efficient Equipment Incentive	Residential Incentive Program
Low-Income WRAP and Low-Income E-Power Wise	Residential Low-Income Weatherization Program (WeCare)
Residential Energy Assessment and Weatherization	Residential Conservation Program
Administrative Call and Rebate Processing Center and the Energy Efficiency MIS Functions	Program Development and Administration
Renewable Energy Program	Green Energy Program & Net Metering
Time of Use Rates	Time of Use Rates

2.0: Regulatory Structure and Legislation of PPL, LG&E, and KU

2.1: PPL

On October 15, 2008, Governor Rendell signed HB 2200 into law as Act 129 of 2008, with an effective date of November 14, 2008. The Act expands oversight responsibilities of the Pennsylvania Public Utility Commission (“PUC”) and imposes new requirements on electric distribution companies (“EDCs”), with the overall goal of reducing energy consumption and demand. Pursuant to an Implementation Order entered by the PUC on the January 16, 2009, PPL submitted a revised Energy Efficiency and Conservation Plan in compliance with Section 2806.1 (b)(1)(i) of Act 129. A subsequent revision to the EEC plan was issued on February 28, 2011 and approved by the PUC on May 5, 2011 (Docket No. M-2009-2093216). Those revisions are reflected in this document. The Plan describes an extensive portfolio of energy-efficiency, conservation, and peak load reduction measures, programs, and customer education. The PPL Portfolio consists of the following programs, all of which are voluntary for customers

1. Efficient Equipment Incentive Program
2. Residential Energy Assessment & Weatherization
3. Compact Fluorescent Lighting Campaign
4. Appliance Recycling Program
5. ENERGY STAR® New Homes Program
6. Renewable Energy Program
7. Direct Load Control Program
8. Time of Use Rates
9. Energy-efficiency Behavior & Education
10. Low-income WRAP
11. Low-income E-Power Wise
12. Commercial and Industrial Custom Incentive Program
13. HVAC Tune-Up Program
14. Load Curtailment Program

These 14 programs are designed to meet the goals established by Sections 2806.1 and 2806.2 of Act 129, as outlined in the PUC’s January Order:

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“This program requires an EDC with at least 100,000 customers to adopt a plan, approved by the Commission, to reduce electric consumption by at least one percent (1%) of its expected consumption for June 1, 2009 through May 31, 2010, adjusted for weather and extraordinary loads. This one percent (1%) reduction is to be accomplished by May 31, 2011. By May 13, 2013, the total annual weather-normalized consumption is to be reduced by a minimum of three percent (3%). Also, by May 31, 2013, peak demand is to be reduced by a minimum of four-and-a-half percent (4.5%) of the EDC’s annual system peak demand during the period of June 1, 2007 through May 31, 2008.”²

These programs are designed as a portfolio of options which, once implemented, will offer PPL’s customers a cost-effective, equitable, flexible, and wide-ranging set of programmatic choices, incentive options, information, and educational opportunities. In a series of orders, the PUC has approved all of these programs together as an integrated portfolio designed to meet Act 129 energy-efficiency and conservation goals in PPL’s service territory.

2.2: LG&E and KU

The need for Demand-Side Management and Energy Efficiency (“DSM/EE”) programs is growing, as Kentucky’s government has recognized at the very highest levels. For example, the Commission expressed its clear desire to see greater development and deployment of DSM/EE programs in its February 17, 2011 Final Order in Case No. 2010-00222:

The Commission believes that conservation, energy efficiency and DSM, generally, will become more important and cost-effective as there will likely be more constraints placed upon utilities whose main source of supply is coal-based generation.

...

[T]he Commission believes that it is appropriate to strongly encourage Meade, and all other electric energy providers, to make a greater effort to offer cost-effective DSM and other energy efficiency programs.³

In November 2008, the Commonwealth of Kentucky issued a report entitled, “Intelligent Energy Choices for Kentucky’s Future”. It outlines seven strategies to diversify sources of energy, conserve energy, and become more energy-efficient to reduce demand. The very first strategy stated in the Governor’s report is, “Strategy 1: Improve the Energy Efficiency of Kentucky’s Homes, Buildings, Industries, and Transportation Fleet,” with a strategic goal of having “[e]nergy efficiency ... offset at least 18 percent of Kentucky’s projected 2025 energy demand.”⁴

² January 16, 2009 Implementation Order (Implementation Order) of the Pennsylvania Public Utility Commission (the Commission) at Docket M-2008-2069887 and the Commission’s Opinion and Order entered on October 26, 2009 at Docket M-2009-2093216.

³ *In the Matter of: Application of Meade County Rural Electric Cooperative Corporation to Adjust Electric Rates*, Case No. 2010-00222, Order at 15-16 (Feb. 17, 2011).

⁴ Intelligent Energy Choices for Kentucky’s Future at v-vi. Available at: http://www.purchaseadd.org/files/pdf/pacro/final_energy_strategy_for_kentucky.pdf

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As Governor Beshear stated in the report, “For Kentucky to be a national energy leader, we must fully integrate the development of our energy resources with our mission to protect the environment...The seven strategies, when implemented, will restructure our energy portfolio so that we can use energy in its broadest sense as a tool for economic development and preserving our environment, which Kentucky desperately needs.”⁵ The report indicates that Kentucky’s energy usage is projected to grow slightly more than 40% between 2008 and 2025 in the absence of energy efficiency efforts. While there is no legislative requirement that LG&E and KU offer energy efficiency to its customers, the Companies promote energy efficiency products and services for three core reasons: (1) To reduce peak demand and delay the need to invest in additional power plant construction; (2) To provide customers with tools and information to become better managers of their energy usage; and (3) To be responsive to the Kentucky governor’s seven-point energy plan which places energy efficiency as a core element in addressing carbon emissions.

3.0: History of DSM Initiatives

3.1: PPL

The Pennsylvania Electricity Generation Customer Choice and Competition Act of 1996 deregulated the generation of electricity in Pennsylvania effective January 1, 1997. The legislation provided a transition to deregulation of generation supply with rate caps put in place for all EDC customers, generally for about 10 years. These rate caps maintained retail rates at 1997 levels while EDCs collected stranded costs created by the restructuring of the industry. As the rate caps began to expire in other states, like Maryland, the PUC realized that those customers were susceptible to much higher electricity prices.

Energy Efficiency in Pennsylvania began to take shape in 2006 with the PUC’s May 19, 2006 Order and June 22, 2006 en banc hearings through which the PUC began an investigation of policies to mitigate potential electricity price increases when rate caps expired. It became apparent that the rate caps which had held customers’ rates constant for so many years would end, exposing the customers to market rates much higher than they were currently paying. On December 21, 2006 during a meeting with the Energy Association of Pennsylvania (“EAPA”), the PUC’s Vice-Chairman identified implementing demand-side response, energy efficiency, and conservation as his top priority and indicated that the Governor and his administration supported such an initiative.

As a result of this meeting and others, utilities in Pennsylvania began to include conservation, energy efficiency and consumer education proposals in their distribution base rate filings. The funds for these programs were included in the future test year claims submitted with the rate case filings. In general, funds requested for energy efficiency and consumer education were modest and covered smaller efficiency programs that were limited in scope. They also covered advertising and other communications that promoted energy efficiency and shopping for electricity supply to the customer base.

⁵ Id. at xii.

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Generally, requests for funding of energy efficiency and energy education programs were approved by the PUC. Even with those funds in place, it became evident that more would need to be done to mitigate the potential increases in electricity prices that would occur when the rate caps expired. The rate caps ended on January 1, 2009 for PPL and on January 1, 2010 for PECO and First Energy.

Prior to rate caps expiring for the three largest electric EDCs in Pennsylvania, the public policy push for energy efficiency shifted from the PUC to the legislature. House Bill 2200 was drafted in early 2008 and signed into law by Governor Rendell on October 15, 2008, as Act 129. The Act laid the framework for energy efficiency and demand reductions for all the Pennsylvania utilities by May 31, 2013, with interim consumption reductions on May 31, 2011. Implementation of the legislation was assigned to the PUC. The PUC's charge is to interpret and administer Act 129, but the PUC does not have authority to change the requirements of Act 129.

The EDCs in Pennsylvania have been on a steep learning curve since Act 129 was passed. Throughout the first two years of implementation, both the PUC and the EDCs have worked to understand how the EDCs' plans would be implemented; how savings would be evaluated, measured, and verified; and how mid-stream corrections to the EDCs' plans could be made to adjust to a dynamic market place. Through collaboration by all stakeholders, significant progress has been made to enhance the overall process by which cost-effective energy savings are achieved in Pennsylvania.

The Act directs the PUC, by November 30, 2013, to determine whether to adopt additional incremental reductions in consumption and demand. The EDCs have asked the PUC to provide guidance and objectives for development of any EE&C plans that would follow the expiration of current EE&C plans on May 31, 2013. Currently, there are no active legislative efforts to modify Act 129.

3.2: LG&E and KU

LG&E began negotiations with interveners in 1992 regarding the implementation of DSM/EE programs for the benefit of its customers, and the recovery of the costs associated with such programs. This collaborative effort, known as the DSM Collaborative resulted in a request to the Commission in November 1993 to approve "The Joint Application for the Approval of Demand-Side Management Programs, a DSM Cost Recovery Mechanism, and a Continuing Collaborative Process on DSM for Louisville Gas and Electric Company" (Case No. 93-150). Initial DSM/EE programs were implemented in 1994.

In December 1995, the DSM Collaborative submitted a filing proposing to begin new DSM/EE programs and to continue the existing programs. The Commission approved the filing in June 1996. The approved programs included initial research and development for the Residential Load Management Program and the Program Development and Administration, which was developed to capture the cost of developing and administering the complete set of DSM/EE programs.

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In 1997, the DSM Collaborative submitted several filings that resulted in all the programs previously approved being proposed again to the Commission along with the addition of the Residential Energy Audit Program. The Commission approved this filing in April 1998.

In May 2001, the Companies received approval for the modification and continuation of DSM/EE programs and cost recovery mechanisms. In 2008 the Commission approved the Companies' latest filing, Case No. 2007-00319. That filing demonstrated the Companies' objective to develop, implement, and promote cost-effective offerings that advance the effective and deliberate use of energy by end-use customers. The intention is to provide customers with the tools they need to help make better use of the energy the Companies provide.

Case No. 2007-00319 represented a significant expansion and emphasis on customer energy efficiency. The three years since the approval of these programs has granted greater insight into the challenges and obstacles associated with the outlined metrics within that program plan. As a result of the lessons learned, the Companies filed with the Commission in April 2011⁶ to enhance the following programs: Residential and Commercial Load Management; Commercial Conservation; Residential Conservation; Residential Low Income Weatherization Program; and Program Development and Administration.

In addition to enhancing several currently approved programs, the Companies sought approval for additional DSM/EE programs that will further increase participation opportunities for customers. These programs include the Residential Incentives Program, and a Residential Refrigerator Removal Program.

Programs the Companies proposed and the Commission approved in Case No. 2007-00319 not included in the April 2011 program plan will remain unchanged in regard to programming, budgets, and associated metrics. The Companies propose to continue these existing programs through 2014. The rationale for the Companies not seeking any changes to these particular programs at this time is that the programs can be categorized as "market transformation programs" or are currently operating satisfactorily within the approved program designs, and therefore do not warrant enhancements. These programs include Residential High Efficiency Lighting, Residential New Construction, Residential and Commercial HVAC Diagnostic and Tune Up, and Customer Education and Public Information.

4.0: Existing Program Descriptions

4.1: PPL

The following provides an overview of the Energy Efficiency and Conservation Act 129 Programs. Programmatic information includes a program description and objectives. Programs include: Efficient Equipment Incentive Program; Residential Energy Assessment &

⁶ 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 – Case No. 2011-00134

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Weatherization; Compact Fluorescent Lighting Campaign; Appliance Recycling Program; ENERGY STAR® New Homes Program; Renewable Energy Program; Direct Load Control Program; Time of Use Rates; Energy-efficiency Behavior & Education; Low-income WRAP; Low-income E-Power Wise; Commercial and Industrial Custom Incentive Program; HVAC Tune-Up Program; and Load Curtailment Program. Also included are descriptions of the administrative function for the Call and Rebate Processing Center and the Energy Efficiency Management Information System (“EEMIS”).

4.1.1. Residential Efficient Equipment Incentive Program

The Efficient Equipment Incentive Program is designed to promote the purchase and installation of a wide range of high-efficiency appliances and equipment. This program provides customers with rebates to offset the higher cost of the qualified appliance and equipment purchases.

An Administrative Conservation Service Provider (“CSP”) was contracted to provide intake, verify eligibility of customer requests for rebates, and process rebates. An Advertising, Marketing and Public Relations CSP was contracted to promote this program. This program was not designed to utilize a CSP at the consumer level. Customers participating in this program are required to submit a paper application requesting a rebate. Customers receive a rebate in the form of a check or a debit card.

A large number of rebates processed are from customers making purchases in small independent stores. Because of the large number of independent retailers in PPL’s territory and the importance of keeping those retailers engaged in the program, a CSP was contracted to work directly with independent retailers, providing a field trainer to visit stores and promote the program.

The objectives of the Residential Efficient Equipment Incentive Program are to: (1) Provide customers with opportunities to reduce their energy costs and increase their energy efficiency; (2) Encourage customers to install high-efficiency lighting equipment and electric appliances; (3) Encourage the use of high-efficiency/ENERGY STAR®-rated appliances; (4) Promote strategies that encourage and support market transformation for high-efficiency appliances and (5) Achieve no less than four million installed measures through 2013, with a total reduction of 29,708 MWh and 5,000 kW.

4.1.2. Residential Energy Assessment & Weatherization Program

The Residential Energy Assessment & Weatherization Program serves as a mechanism to assess the energy performance of customers’ homes, educate customers about actions they can take to increase the energy efficiency of their homes, and distribute low cost energy efficiency measures (including compact fluorescent lamps, surge strips, and pipe insulation).

The program targets residential customers with a household income greater than 150% of the Federal Poverty Level who live in a single family or mobile homes with electric heat, electric water heating, and/or central air conditioning.

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There are two tracks to the program: a walk through Survey with a customer cost of \$50 and a Comprehensive Energy Audit with a customer rebate of \$100 or \$250 depending on the customer's heating and cooling source. Customers participating in the Comprehensive Energy Audit program have the opportunity to receive additional rebates if they install two or more of the measures recommended in their audit.

The objectives of the Residential Energy Assessment & Weatherization Program are to: (1) Provide customers with the opportunity to participate in a walk-through survey or comprehensive energy audit; (2) Provide customers with opportunities to reduce their energy costs and increase their energy efficiency; (3) Encourage customers to weatherize their homes by providing rebates; (4) Install low-cost energy saving measures as part of both the survey and the audit which may result in immediate savings; and (5) Obtain participation by no less than 5,940 customers through 2013, with a total reduction of 5,960 MWh and 590 kW.

4.1.3. Compact Fluorescent Lighting Campaign -- CFL Program

The Compact Fluorescent Lighting Campaign ("CFL Program") encourages customers to install ENERGY STAR® rated CFL bulbs. The program has two components: a retail upstream lighting incentive that significantly reduces the customer cost of purchasing ENERGY STAR CFLs at a participating retail store and a CFL giveaway component that distributes free CFLs at various events and activities.

The objectives of the CFL Program are to: (1) Provide a mechanism for customers to easily obtain discounted ENERGY STAR-qualified CFLs; (2) Develop and execute strategies aimed at transforming the market for ENERGY STAR-qualified CFLs with the goal of increasing the number of qualified products purchased and installed in the service territory; (3) Encourage customers to install CFLs obtained from the give-away program; (4) Increase consumer awareness and understanding of the energy-efficiency of CFLs, as well as proper use of CFLs in various lighting applications; (5) Promote consumer awareness and understanding of the ENERGY STAR label; (6) Promote other PPL energy efficiency programs through CFL package inserts; and (7) Distribute no fewer than 7,125,000 CFLs through 2013, with a total reduction of 292,100 MWh and 45,630 kW.

4.1.4. Appliance Recycling Program

The Appliance Recycling Program provides customers with an incentive to dispose of their older inefficient refrigerators, freezers and room air conditioners. Refrigerators, freezers and air conditioners are picked up from the customer's location. Room air conditioners are only picked up at residential customers' home in conjunction with a pickup of a refrigerator or freezer. After independent assessments, the same CSP was chosen by each EDC to provide appliance recycling. That CSP has opened two recycling facilities that process units picked up from the Pennsylvania EDC customers.

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PPL's program primarily targets residential customers, but it is available to all customer segments wanting to recycle a working, residential grade refrigerator, freezer, or room air conditioner unit. Refrigerators must be at least 10 cubic feet in size.

The objectives of the Appliance Recycling Program are to: (1) Encourage customers to dispose of their existing, inefficient appliances when they purchase new ones or eliminate a second unit that may not be needed; (2) Reduce the use of secondary, inefficient appliances; (3) Ensure appliances are disposed of in an environmentally responsible manner; (4) Provide on-site decommissioning to ensure appliances are not resold in a secondary market; and (5) Collect and recycle no fewer than 49,000 appliances⁷ through 2013, with a total reduction of 114,760 MWh and 13,150 kW.

4.1.5. ENERGY STAR® New Homes Program

The ENERGY STAR® New Homes Program was designed to encourage construction of energy-efficient new homes addressing both the building shell and electrical equipment. The program was based on the US Environmental Protection Agency's ENERGY STAR® New Homes program. Participants are expected to work within the framework of the Residential Energy Services Network (RESNET®) accredited Home Energy Rating System (HERS) to receive a qualifying HERS rating. The program was designed to offer financial incentives for technical assessments (*i.e.*, HERS ratings) and to offset the higher purchase price of new, high-efficiency equipment based on achieving ENERGY STAR® certification.

The objectives of the ENERGY STAR® New Homes Program are to: (1) Promote construction of energy-efficient new homes; (2) Educate construction industry professionals and customers about the benefits of ENERGY STAR new homes; and (3) Obtain participation by no less than 1,930 customers through 2013, with a total reduction of 5,200 MWh and 590 kW.

PPL is recommending to the PUC that the ENERGY Star New Homes program should not be implemented in this EEC plan because: (1) Savings are negligible compared to existing codes and standards that represent the baseline from which savings are measured; (2) It is costly to build the infrastructure to support the program; (3) New home construction is at very low levels due to the poor economic conditions; and, (4) Customers and builders can get incentives through other residential EEC programs for appliance and higher insulation levels.

4.1.6. Renewable Energy Program

PPL's Renewable Energy Program was designed to encourage customers to install a solar photovoltaic ("PV") array or ground-source heat pump ("GSHP") at their home or building by offering rebates to reduce the overall costs.

⁷ This number was reduced from 69,000 as part of the course correction of the Act 129 Residential program portfolio.

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The rebate for PVs was \$2/watt, up to a maximum of \$5,000 for residential and \$500,000 for Government, Non-profit and Institutional customers. The rebate for GSHPs was \$217/ton for Residential, Government, Non-profit and Institutional customers. Helgeson, the Administrative CSP, manages the rebate process.

The objectives of the Renewable Energy Program are to: (1) Provide customers with opportunities to self-generate electricity using clean, renewable resources; (2) Encourage customers to install solar photovoltaic systems and geothermal heat pumps; (3) Promote strategies that encourage and support market transformation toward qualifying clean, renewable energy generation; and (4) Achieve no less than 1,260 installed measures through 2013, with a total reduction of 18,500 MWh and 2,000 kW.

4.1.7. Direct Load Control - Peak Saver Program

Direct Load Control program is designed for residential and small commercial customers. The program will operate weekdays between noon and 7:00 PM during the peak summer season, from June 1st to September 30th. A control device installed on a customer's central air conditioning/heat pump unit by the CSP will allow the unit to be cycled off during peak periods.

The objectives of the Direct Load Control Program are to: (1) Provide incentives to customers willing to reduce their energy consumption during summer peak hours; (2) Educate customers about energy efficiency and peak periods; (3) Reduce demand by 33MW over 100 hours of peak demand during the summer of 2012; and (4) Install approximately 50,000 load control devices to reduce peak demand by 33,000kW.

4.1.8. Time of Use Rates ("TOU") Program

The TOU program, offered to residential, low-income, Small C&I and Government, Non-profit and Institutional customers, provides pricing that encourages customers to shift electricity usage from on-peak periods (when electricity demands and wholesale energy prices are higher) to off-peak periods (when such demands and prices are lower). Shifting use from on-peak to off-peak periods reduces peak demand on generation resources, contributes to reducing wholesale electricity prices during the hours of highest demand, and provides customers with an opportunity to reduce their monthly electric bill.

TOU rates change in June 2011 and then quarterly thereafter. Participants can enter/leave the TOU Program at will. TOU has not sustained customer interest due to the volatility of the rate.

The objectives of the TOU Program are to: (1) Educate customers about energy-efficiency and peak periods; and, (2) Help customers save money by shifting energy use from peak hours to off-peak hours.

4.1.9. Energy Efficiency Behavior & Education Program

The Energy Efficiency Behavior & Education Program, designed for residential customers, provides customers with a bi-monthly report card. These reports include information about free or low-cost energy efficiency measures; behavioral changes a customer may take to reduce energy usage; the value of installing energy-efficiency measures; and information about how behavior and practices impact energy usage. Hard copies of the reports are sent by mail.

The objectives of the Energy Efficiency Behavior & Education Program: (1) Educate customers about free or very low-cost measures and behavior changes that may reduce energy consumption or demand; (2) Educate customers about PPL's online resources and energy efficiency and conservation programs; (3) Encourage customers to adopt energy efficient behaviors and to install energy efficiency measures in their homes; (4) Generate customer reports comparing individual customers to other customers with similar energy usage patterns; and (5) Obtain participation by no fewer than 100,000 customers in Program Year 3 and Program Year 4, with a total reduction of 50 GWh.

4.1.10. Low-Income Winter Relief Assistance Program ("WRAP")

WRAP was a pre-existing PPL program designed to reduce electric consumption and improve comfort for low-income customers. The program provides free energy audits, energy-efficiency measures, and energy education to income-qualified participants. As part of the Act 129 portfolio, PPL increased funding for WRAP by approximately 60% to support delivery to more customers.

WRAP targets customers at or below 150% of the Federal Poverty Level. The program is available to customers in existing single-family housing and in existing multifamily housing, where 50% or more tenants are low-income qualified. Further, the program aims to reach PPL customers that received WRAP assistance in the past and may be in need of further WRAP services, as well as customers that may not have been eligible for low-income assistance due to eligibility rules requiring more than nine months residence in a dwelling.

The objectives of the WRAP program are to: (1) Assist low-income customers to reduce their energy use and energy expenses; (2) Maintain partnerships with social service agencies, Community Based Organizations ("CBOs"), and local contractors to ensure maximum and timely assistance; (3) Provide a referral stream to low-income programs, including On Track, Operation HELP⁸, E-Power Wise, and LIHEAP; (4) Obtain participation by no fewer than 23,590 customers through 2013, with a total reduction of 18,695 MWh and 2,985 kW.

⁸ On Track is PPL Electric Utilities low-income customer debt forgiveness program and Operation Help is PPL Electric Utilities fuel fund.

4.1.11. Low-income E-Power Wise Program

The E-Power Wise Program, delivered via community based and non-profit organizations, provides low-income customers with free energy-efficiency education and energy-efficiency measures for self installation.

The objectives of the E-Power Wise Program are to: (1) Provide quality energy efficiency education to low-income customers so they can make informed choices about their energy use; (2) Provide information about low-cost/no-cost energy efficiency strategies low-income customers can use in their homes; (3) Provide low-income customers with energy-efficiency measures in free take-home energy efficiency kits; and (4) Obtain participation by no fewer than 7,200 customers through 2013 with a total reduction of 1,080 MWh and 150 kW.

4.1.12. Commercial / Industrial Custom Incentive & Prescriptive Program

These Programs together provide incentives for Small and Large C&I, Government, Non-profit and institutional customers to install electric energy efficiency measures. The program provides prescriptive rebates based on per unit incentives for each measure installed or a custom incentive for measures not eligible for prescriptive incentives that rely on verified savings prior to payment. The program also launched a direct service for Small C&I and Government / Non-Profit customers that provide higher incentives to more quickly bring energy efficiency resource measures to this target sector.

The objectives of the Commercial and Industrial Custom Incentive and Prescription Program are to: (1) Provide customers with opportunities to reduce their energy costs and increase their energy-efficiency; (2) Encourage the installation of high-efficiency equipment not included in PPL Electric Utilities' Efficient Equipment Incentive Program by C&I customers in new and existing facilities; (3) Encourage equipment repairs and optimization and operational or process changes that reduce electricity consumption and peak demand; (4) Encourage a "whole facility" approach to energy-efficiency; (5) Increase the market penetration of high-efficiency equipment; (6) Encourage advanced energy-efficiency strategies required for certification by national market transformation programs such as Leadership in Energy and Environmental Design (LEED); (7) Encourage customers to install high-efficiency HVAC, lighting equipment, electric appliances and the use of high-efficiency/ENERGY STAR®-rated equipment; (8) Promote strategies that encourage and support market transformation for high efficiency appliances and equipment; and (9) Obtain participation by no less than 400 customers through 2013, with a total reduction of 826,626 MWh and 127,370 kW.

4.1.13. HVAC Tune-Up Program

The HVAC Tune-Up Program (delivered through HVAC contractors) is designed to assist Small C&I customers to increase the operating performance of electric HVAC systems in commercial buildings. The Program provides financial incentives to HVAC contractors to diagnose and correct performance inefficiencies in existing packaged HVAC equipment. Incentives for

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retrofits are given to the customer. Retrofits include such measures as modifications to existing equipment (*i.e.*, economizer adjustments) and thermostat replacement.

The objectives of the HVAC Tune-Up Program are to: (1) Optimize HVAC unit performance; (2) Assist commercial customers in lowering their energy bills and operating costs; and (3) Obtain participation by no less than 5,770 customers through 2013, with a total reduction of 22,180 MWh and 11MW.

4.1.14. Load Curtailment Program

The Load Curtailment program, designed for Large C&I customers, provides incentives to curtail demand during the peak summer season. The CSP is responsible to enroll and curtail Large C&I customers load during the summer months (June-Sept).

Customers will be notified of peak-hour events and will be requested to decrease load during that period by shifting or eliminating load or using back-up or distributed generation that meets environmental regulations. Customers will be paid an incentive by the CSP.

The number of participants, the number of interruptible hours per participant, and the size of the participant's load reduction will be managed by the CSP. Incentive levels will vary depending on the number of interruptions, the size of the load reductions, and other factors agreed upon between the customer and the CSP. The program will be designed to coordinate with the demand response programs of PJM (the Regional Transmission Operator) to ensure that there is no "double counting" of reductions and to rely on PJM verification protocols to the extent practical.

The objectives of the Load Curtailment Program are to: (1) Reduce peak demand by providing incentives for energy usage reduction during peak hours in summer period; and (2) Obtain 300 MW over 50 of the top 100 hours of peak demand during the summer of 2012.

4.1.15. Administrative Function: Call and Rebate Processing Center

The Administrative Call and Rebate Processing Center is responsible for providing call and rebate processing for Act 129 energy efficiency rebate programs. This includes providing a toll-free contact number, integrated voice response/voicemail, live operators, and other means for customers to contact the center with questions about programs, rebates, problems, etc. The Center is responsible for managing intake and approval of rebates, reviewing rebate applications, verifying customer eligibility, entering all relevant data into PPL's Energy Efficiency Management Information System ("EEMIS"), and verifying that the equipment or actions taken by the customer is in compliance with PPL's program requirements.

The objectives of the Administrative Call and Rebate Processing Center are to: (1) Provide a call center with knowledgeable staff to manage customer intake and routing, process applications and rebates, track and verify eligibility and program data, provide customer and transaction information to PPL, and referrals to other programs; (2) Refer customers interested in a

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comprehensive energy audit to independent, BPI (Building Performance Institute, Inc.) certified trade allies for Energy Audits and Weatherization explaining both program tracks to the customer and directing customers to the appropriate track; (3) Handle customer calls, review and verify applications, process rebates, track customer and project data, and report results to PPL; (4) Document measure installation, instances of customer complaints and remediation activities and other information associated with projects where rebate processing provides the primary means of tracking program activity; and (5) Maintain a grade of service of 80 percent of the calls from PPL customers answered within 20 seconds or less.

**4.1.16. Administrative Function: Energy Efficiency Management
Information System (“EEMIS”)**

EEMIS is a computer tracking system custom designed and implemented to capture data for all Energy Efficiency & Conservation Programs. This system is collecting data that includes, but is not limited to, kWh savings customer account numbers, date of installation, and type and number of measure(s) installed.

The objectives of EEMIS are to: (1) Provide a foundation for tracking, managing, and reporting on PPL’s Act 129 programs; (2) Provide progress reports to regulators on the status of the programs compared to the goals for each program; and (3) Generate data for annual and other reports required by the PUC.

4.2. LG&E and KU

As the Commonwealth’s largest utilities, serving more than 2.8 million Kentuckians, the Companies seek to educate and empower consumers of all ages to do their part in the fastest, cleanest, most cost-effective method of reducing our growing demand for energy by embracing energy efficiency and conservation as a way of life. The following provides an overview of existing and unchanged programs, proposed enhancements to existing and new Energy Efficiency/Demand Side Management Programs.⁹ Programmatic information will include a program description and objectives. Existing programs that will be overviewed will include: Residential High-Efficiency Lighting Program; Residential New Construction Program; Residential and Commercial HVAC Diagnostics and Tune-up Programs; Customer Education and Public Information; and Dealer Referral Network. Programs with proposed enhancements before the Commission in Case No. 2011-00134 that will be overviewed will include: Residential and Commercial Load Management Program; Commercial Conservation Program; Residential Conservation Program; Residential Low-income Weatherization Program (WeCare); Responsive Pricing; Smart Metering Pilot Program; and Program Development and Administration. New programs proposed in Case No. 2011-00134 that will be overviewed will include: Smart Energy Profile Program; Residential Incentives Program and the Residential Refrigerator Removal Program.

⁹ Case No. 2011-00134 was filed with the Kentucky Public Service Commission on April 14, 2011. This case includes enhancements to existing programs that were approved in Case No. 2007-00139 as well as a request for new programs for inclusion in the DSM/ Energy Efficiency Program Plan. Case No. 2011-00134 is currently under Commission review.

Existing and Unchanged Programs (Approved in Case No. 2007-00139)

4.2.1. Residential High-Efficiency Lighting Program

The Residential High Efficiency Lighting Program is designed to facilitate market transformation by creating a shift in LG&E and KU consumer purchasing incandescent light bulbs to Compact Fluorescent Light bulbs (CFL). LG&E and KU utilize this program to increase customer awareness of environmental and financial benefits of the CFL bulb and as a result, increase societal acceptance and market penetration.

Residential electric customers participate in the Residential High Efficiency Lighting Program by: (1) returning postage paid business reply cards that have been mailed directly to their home; (2) completing an online residential audit; or (3) taking advantage of manufacturers' coupons that typically are included with their utility bill or mailed directly to paperless billing customers.

The objectives of the Residential High Efficiency Lighting Program are to: (1) Place 5.8 million Energy Star rated CFLs within the residential sector, with a total energy and demand reduction of 341,831 MWh and 23,083Kw through 2014.

4.2.2. Residential New Construction Program

The New Residential Construction program is designed to reduce residential energy usage and facilitate market transformation by creating a shift in builders' new home construction to include energy-efficient construction practices. This 2010 "Leadership in Housing Award" winning program has succeeded in engaging a significant portion of Kentucky's new-home construction sector through outreach and training activities. Orientation sessions introduced builders, contractors, design professionals and energy raters to the requirements and benefits of program participation.

The objectives of the New Residential Construction program are to: (1) Educate customers and promote increased construction of Energy Star rated homes within the residential sector; (2) Have 4,487 new homes Energy Star® Rated through the Home Energy Rating System with a total energy and demand reduction of 11,933 MWh and 3,807Kw through 2014.

4.2.3. Residential/Commercial HVAC Diagnostics & Tune-up Programs

The Residential and Commercial HVAC Diagnostic and Tune-up program targets customers with HVAC system performance issues. The objectives of the program are to: (1) Reduce peak demand and energy use by conducting a diagnostic performance check on residential and small commercial unitary air conditioning and heat pump units, air restricted indoor and outdoor coils, and over and under refrigerant charge; (2) Provide in the residential sector 6,950 diagnostics and 4,518 tune-ups with a total energy and demand reduction of 5,672 MWh and 2,575 Kw through 2014; (3) Provide in the commercial sector 3,750 diagnostics and 3,510 tune-ups with a total energy and demand reduction of 9,891 MWh and 2,374 Kw through 2014.

4.2.4. Customer Education and Public Information

The Customer Education and Public Information programs are designed to help customers make sound energy-use decisions, increase control over energy bills and empower them to actively manage their energy usage. Customer Education and Public Information is accomplished through two processes: elementary and middle-school programming and a mass-media campaign.

The objective of the Customer Education and Public Information is to: (1) Increase public awareness and understanding of both the urgent need for more efficient use of energy and the environmental and financial impacts created by climate change issues and (2) Increase customer awareness and encourage utilization of the energy efficiency products and services.

Enhancements to Existing Programs (Pending Case No. 2011-00134)

4.2.5. Residential and Commercial Load Management Program

The existing Demand Conservation Program is voluntary and has been operational since 2001. Demand Conservation employs switches in homes and small businesses to help reduce the demand for electricity during peak times. The Program uses one-way paging signals to communicate with the switches to cycle central air conditioning units, heat pumps, electric water heaters and pool pumps off and on through a predetermined sequence.

The Demand Conservation Program has experienced success in program enrollment since its inception; however, over the nine years of program development the Companies have reached 24% market saturation rate. To address the market saturation the Companies are seeking approval for the following proposed program enhancements: (1) The addition of another full time employee (FTE) to assist in outreach efforts to the multi-family and commercial customer segment; (2) The ability to modify and increase the financial incentives to attract those customers who have not been interested in this voluntary customer program; (3) Install 91,800 devices in the residential market through 2017, with a total energy and demand reduction of 20,009 MWh and 79.9 MW; and (4) Install 3,540 devices in the commercial market through 2017, with a total energy and demand reduction of 907 MWh and 5.2 MW .

4.2.6. Commercial Conservation Program

The Commercial Conservation / Commercial Incentive Program is designed to provide energy efficiency opportunities for the Companies' commercial class customers through energy audits and to increase the implementation of energy efficiency measures identified through the audit by providing financial incentives to assist with the replacement of aging and less efficient equipment. This proposed filing enhancement is an effort to be responsive to the growing rate of requests for inclusion of other applications and needs of the commercial customer segment. The Companies seek to enhance this program in several ways: (1) the Companies seek to add to the

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energy efficiency retrofits eligible for rebate incentives to include Refrigeration; (2) the Companies seek to add Commercial Customized Incentives to incent energy efficient retrofits for customers with less typical technologies and those retrofits not covered by the existing Commercial Conservation/Rebate Program (i.e., equipment not specified in the current program literature). Incentives available to all customers in this program's rate classes will be developed based upon a \$100 per kW for calculated efficiency improvements; and (3) the Companies seek to extend the current Commercial Conservation component of the Program through 2017.

The objectives of the Commercial Conservation and Commercial Incentives Program are to: (1) Identify energy efficiency opportunities for the Companies' commercial class customers through no-charge energy audits and to increase implementation rates for effective measures by offering energy efficient-new technology equipment incentives for replacement of aging, less efficient equipment; and (2) Attain a total energy and demand reduction of 384,916 MWh and 144.8 MW.

4.2.7. Residential Conservation / Home Energy Performance Program

The Residential Conservation Program / Home Energy Performance Program is designed to help customers reduce energy costs within the home using on-line or on-site energy audits. The program works with customers to identify specific steps they can take to reduce energy costs, making them better energy managers. The on-line energy audit component to this program will remain unchanged while the on-site audit component will be modified to become a more comprehensive program that includes certified auditors and tiered incentives for residential customers to support the implementation of energy saving measures. The structure of this program would feature auditors certified to national standards. The auditors would use standardized software products similarly endorsed by national ruling bodies such as the Residential Energy Services Network (RESNET), the Building Performance Institute (BPI), and the BESTEST-EX standards committee.

The objectives of the Residential Conservation / Home Energy Performance Program are to: (1) Support customers in identifying specific steps they can take to reduce energy costs, making them better managers of energy; and (2) Complete 38,000 online audits and 12,800 onsite audits through 2017, with a total energy and demand reduction of 32,953 MWh and 8.4 MW.

4.2.8. Residential Low-income Weatherization Program (WeCare)

The Residential Low Income Weatherization Program (WeCare) is designed to reduce the energy consumption of LG&E and KU's low-income customers. The program provides both directly installed weatherization measures and an education component to enlist the customer as a "partner" in ensuring the energy savings. Through the education portion of the program, customers gain a better understanding of how to keep utility bills as low as possible through better energy usage habits. As an added long-term benefit, the educational information provided to customers is something they can take with them wherever they live. Weatherization improves customers' comfort and reduces the tendency to raise the thermostat in winter or lower it in summer. As energy usage in a home is reduced and additional customers are served, customer bills become more affordable.

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To address the growing need in this customer segment, the Companies are seeking approval for the following proposed program enhancements: (1) additional funds that will allow for increased weatherization measures for the low-income customer segment, further increasing energy savings; (2) increase the number of customers served over the program plan. This increased funding request comes as a result of customer feedback as well as additional opportunities identified while providing weatherization measures in customer homes. As a result, increases to the funding level for program tiers and increasing the number of customers served are the only changes being proposed to this program; all other aspects of the program including but not limited to program eligibility and home ownership status shall remain the same; and (3) the Companies seek to extend the WeCare Program through year seven of the proposed program plan.

The objectives of the Residential Low Income Weatherization Program (WeCare) are to: (1) Provide low-income customers who would otherwise not be likely to participate in Energy Efficiency programs an opportunity to do so; (2) Provide energy efficient products and energy management techniques, to allow recipients of the program to gain control over their utility bills; and (3) Provide an audit, energy education, and home weatherization services to 18,900 low-income participants; with a total energy and demand reduction of 41,455 MWh and 4,130 Kw.

4.2.9. Program Development and Administration

Program Development and Administration has several responsibilities within the Customer Energy Efficiency Department. Program Development and Administration efforts include: evaluation, measurement and verification of the existing energy efficiency portfolio; new program concept and initial design; market research related to new programming; research and technical evaluation of new technologies and programs; overall program tracking and management; and the development of key personnel. The daily activities performed by the program development and administration team support the LG&E and KU objective to develop, implement and promote cost effective offerings that advance the effective and deliberate use of energy by end-use customers.

Since the 2007 filing approval it has become evident that the amount of individual program needs has surpassed earlier projections. With the significant program growth, the Companies seek additional staff to support procurement; marketing; financial analysis; and the rigorous evaluation, measurement and verification (EM&V) efforts associated with each of the programs in the DSM portfolio. EM&V efforts of the Program Development and Administration program include data on program design, delivery, impacts and return on investment.

New Programs (Pending Case No. 2011-00134)

4.2.10. Residential Incentives Program

The Residential Incentives Program is a new program designed to encourage customers to purchase various Energy Star appliances, HVAC equipment, or window films that meet certain requirements, qualifying them for an incentive. This is a simple program where as long as a qualifying appliance or product is purchased during the program period, only a completed Rebate Application Form and a copy of the proof of purchase (i.e., valid store receipt) needs to be submitted to receive the applicable incentive.

The objectives of the Residential Incentives Program are to: (1) Reduce energy utilization that provides benefits to the environment and will assist in the reduction of the customer's energy expenses; (2) Provide 128,200 incentives in the residential customer segment through 2017 with a total energy and demand reduction of 100,720 MWh and 18.6 MW.

4.2.11. Residential Refrigerator Removal Program

The Residential Refrigerator Removal Program is designed to provide removal and recycling of inefficient secondary refrigerators and freezers from LG&E and KU customer households. The removal of these inefficient units will reduce consumption and demand. The Companies will work with identified third-party vendors to collect and transport the inefficient appliance to an appropriate recycling center that will be responsible for adhering to any local, state or federal recycling ordinances. Customers participating in this program will be provided a one-time incentive.

The objectives of the Residential Refrigerator Removal Program are to: (1) Remove secondary refrigerator units from the electric grid that will result in the reduction of consumption and demand; (2) Remove 62,000 refrigerators through 2017 with a total energy and demand reduction of 46,500 MWh and 5.3 MW.

Time of Use Programs

The Time-of-Userates offered by LG&E currently covers all customer classes except a small Power Service (50 kW to 250 kW). It should also be noted that the Time-of-Use rates available to Residential Service and General Service are pilot programs. KU does not offer Time-of-Use rates below 250 kW. The current programs provide price signals that encourage more efficient use of energy and a reduction of peak demand. These programs provide opportunities for customers to better manage their energy bills while reducing demand on the generation resources.

The objectives of these programs are to (1) Educate customers about energy-efficiency and peak periods; and, (2) Help customers manage their energy usage by shifting use from peak hours to off-peak hours.

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Renewable Energy

While there is no RPS in Kentucky, LG&E and KU offer customers a Green Energy Program, Net Metering Service, and consider renewable energy technologies in the supply-side analysis as discussed in the integrated resource plan.

CONCLUSION

The energy efficiency and conservation programs offered by PPL, LG&E, and KU have been reviewed and summarized above in compliance with Ordering Paragraph No. 3 of the Commission's final order in Case No. 2010-00204. As shown by the foregoing discussion, the current DSM programs operated by PPL are similar in nature to those DSM programs currently being operated through KPSC approved Case No. 2007-00139 or those being proposed in KPSC Case No. 2011-00134.

APPENDIX

Appendix 1

Energy Efficiency Program Portfolio / PPL Corporation

Program Name	Start Date	Program Budget
Efficient Equipment Incentive	November, 2009	\$88,934,000
Residential Energy Assessment & Weatherization	May, 2010	\$2,755,818
Compact Fluorescent Lighting Campaign	January, 2010	\$17,742,646
Appliance Recycling Program	November, 2009	\$9,082,000
ENERGY STAR® New Homes Program ¹⁰	Scheduled to start mid 2010	\$2,731,000
Renewable Energy Program ¹¹	March 2010	Residential sector - \$1,109,098 / Government and Non-profit sector - \$4,540,271
Direct Load Control Program	March 2011	\$10,621,000
Time of Use Rates	May 2010	Residential - \$4,038,000 Small C&I - \$750,000 Government/Non-Profit -\$56,000 Low-Income - \$813,000
Energy-efficiency Behavior & Education	April 2010	\$2,830,000
Low-income WRAP	April, 2010	\$28,657,000
Low-income E-Power Wise	March, 2010	\$681,000

¹⁰ In the time that has passed since the approval of PPL Electric Utilities' Act 129 Plan, building codes and standards have changed, becoming more stringent and making it more difficult to achieve incremental energy savings (see program description). At this time, a recommendation is being made to the PA Public Utility Commission to cancel the program.

¹¹ Due to oversubscription and depletion of funds, the Residential PV portion of the program closed May 2010; the Government, Non-profit and Institutional PV portion of the program closed August 2010; and the residential GSHP portion of the program closed January 2011. The Government, Non-profit and Institutional GSHP program is still open.

Program Name	Start Date	Program Budget
Commercial and Industrial Custom Incentive Program	March, 2010	\$20,598,000
HVAC Tune-Up Program	April, 2010	\$2,154,418
Administrative Call and Rebate Processing Center	November, 2009	\$3,908,000
Energy Efficiency Management Information System Program	December, 2009	\$3,150,428

Appendix 2

Energy Efficiency Program Portfolio / LG&E and KU

Existing / Unchanged Enhanced Program	Program Inception Date	Budget Period	Program Budget
Residential High-Efficiency Lighting Program	September, 2008	2007-2014	\$24,116,713
Residential New Construction Program	September, 2008	2007-2014	\$7,778,269
Residential and Commercial HVAC Diagnostics and Tune-up Programs	September, 2008	2007-2014	Residential: \$2,937,023 Commercial: \$2,632,216
Customer Education and Public Information	March, 2009	2007-2014	\$23,531,533
Enhanced Program			
Residential and Commercial Load Management Program ¹²	2001	2011-2017	Residential: \$88,474,000 Commercial: \$4,095,000
Commercial Conservation Program ¹³	1994	2011-2017	\$23,377,000
Residential Conservation Program ¹⁴	February, 1997	2011-2017	\$14,666,000
Residential Low-income Weatherization Program (WeCare) ¹⁵	1994	2011-2017	\$34,865,000
Program Development and Administration	September, 2008	2011-2017	\$9,680,000

¹² Program enhancement included in Case No. 2011-00134. Proposed enhancement adjusts annual energy and demand targets and increases customer incentives. Budget reflects approved enhancements to programming.

¹³ Program enhancement included in Case No. 2011-00134. Proposed enhancement includes the addition of refrigeration and customized rebates for customers. Budget reflects approved enhancements to programming.

¹⁴ Program enhancement included in Case No. 2011-00134. Proposed enhancement provides incentives for implementation for audit results. Budget reflects approved enhancements to programming.

¹⁵ Program enhancement included in Case No. 2011-00134. Proposed enhancement increases allowable energy measures for participants. Budget reflects approved enhancements to programming.

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New Programs	Program Inception Date	Budget Period	Program Budget
Residential Incentives Program	TBD	2011-2017	\$16,780,000
Residential Refrigerator Removal Program	TBD	2011-2017	\$12,823,000