

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND	)	
ELECTRIC COMPANY, ASSOCIATION OF	)	
COMMUNITY MINISTRIES, INC., PEOPLE	)	
ORGANIZED AND WORKING FOR ENERGY	)	CASE NO.
REFORM, AND KENTUCKY ASSOCIATION FOR	)	2007-00337
COMMUNITY ACTION, INC. FOR THE	)	
ESTABLISHMENT OF A HOME ENERGY	)	
ASSISTANCE PROGRAM	)	

FIRST DATA REQUEST OF COMMISSION STAFF TO  
LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 6 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 24, 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 shall make timely amendment to any prior responses 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 LG&E fails or refuses to furnish all or part of the requested information, LG&E shall provide a written explanation of the specific grounds for its 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 page 3 of the Application. Compare the terms, conditions, and requirements of the Home Energy Assistance (“HEA”) program currently in effect with the terms, conditions, and requirements of the proposed 5-year HEA program. For each difference or change between the programs identified, describe the reason(s) for the difference or change and explain why the proposed HEA program treatment is reasonable.

2. Refer to page 7 of the Application. Under the current HEA program, the arrearage limit is no more than \$700. The proposed HEA program includes an initial arrearage limit of \$1,000 with an option to increase the limit in subsequent years if it is determined this requirement eliminates a large number of potential clients.

a. Explain in detail why LG&E did not submit any discussion or analysis in support of this change in the arrearage limit.

b. Provide a discussion of the reason(s) for the change in the arrearage limit and include any analysis that supports the proposed change.

3. Refer to pages 18 and 19 of the Application.

a. Explain why the proposed 5-year HEA program does not provide for the filing of a comprehensive program assessment before the end of the 5-year period.

b. Would LG&E be agreeable to filing a comprehensive HEA program assessment no later than 6 months prior to the end of the proposed 5-year program? Explain the response.

4. Refer to the HEA comprehensive assessment report ("HEA Assessment") filed with the Commission on March 30, 2007.

a. The Commission's November 24, 2004 Order in Case No. 2004-00304,<sup>1</sup> page 11, required that the HEA Assessment analyze the movement of participants in and out of the HEA program to determine if benefits to the participants are short term or long term in nature. This subject is addressed on page 24 of the March 30, 2007 filing. The report narrative does not appear to address the question of whether, when participants move in and out of the HEA program, benefits to the participants are short term or long term in nature. Indicate where in the HEA Assessment this evaluation is presented. If the question has not been addressed, explain why this topic was omitted.

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<sup>1</sup> Case No. 2004-00304, Joint Application of Louisville Gas and Electric Company, Metro Human Needs Alliance, Inc., People Organized and Working for Energy Reform, and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program.

b. Page 13 of the November 24, 2004 Order required that the HEA Assessment include an explanation of how LG&E's level of involvement in the HEA program has resulted in the active monitoring of the HEA program. This subject is addressed on pages 26 through 30 of the March 30, 2007 filing. The report narrative does not appear to address the subject of whether LG&E's level of involvement in the HEA program has resulted in the active monitoring of the program. Indicate where in the HEA Assessment this topic is addressed. If the question has not been addressed, explain why this topic was omitted.

5. There are 14 counties in Kentucky in which both LG&E and Kentucky Utilities Company provide service. Both utilities have HEA programs, however, there are differences between the two programs. During the 3 years LG&E's HEA program has been in operation, describe any problems of which LG&E is aware concerning the administration of two different HEA programs in the 14-county "overlap" area.



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Public Service Commission  
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DATED August 20, 2007

cc: All Parties