

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

JOINT APPLICATION OF KENTUCKY UTILITIES )  
COMPANY, KENTUCKY ASSOCIATION FOR )  
COMMUNITY ACTION, INC., AND COMMUNITY )  
ACTION COUNCIL FOR LEXINGTON-FAYETTE, )  
BOURBON, HARRISON, AND NICHOLAS )  
COUNTIES, INC., FOR THE ESTABLISHMENT OF )  
A HOME ENERGY ASSISTANCE PROGRAM )

AUG 24 2007

PUBLIC SERVICE  
COMMISSION

CASE NO. 2007-00338

REQUEST FOR INFORMATION POSED BY THE ATTORNEY GENERAL

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Request for Information to Louisville Gas and Electric Company, to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from the Office of Attorney General.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

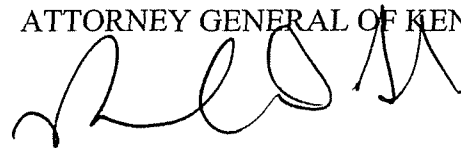
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO  
ATTORNEY GENERAL OF KENTUCKY



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**CERTIFICATE OF SERVICE AND NOTICE OF FILING**

I hereby give notice that this the 24<sup>th</sup> day of August, 2007, I have filed the original and ten copies of the foregoing with the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

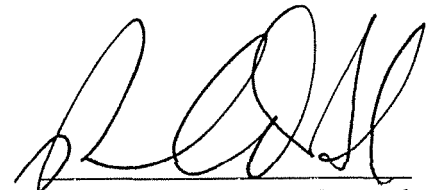
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Assistant Attorney General

**REQUEST FOR INFORMATION**  
**Case No. 2007-00338**

1. Please reference the Application, at page 3, paragraph 6. Please provide an estimate of the costs to unify the two Companies' HEA programs. Does the company have any estimate of savings which would result from the unification of the programs (e.g. reductions in administrative costs, etc.)? Does the company have any plans to combine the two programs at a later time?
  
2. Please reference the Application, at page 6, paragraph 16. Please explain what action is taken if a potential participant is determined to be a "high energy user."
  
3. Please reference the Application, at page 6, paragraph 16. Please provide an example of the assessment factors used to determine client eligibility. With this example, please provide an explanation detailing the factors examined and their values and ranges. Please also indicate whether a client's preceding 12 month usage is examined as part of this assessment or whether the assessment examines only one month. Please also indicate whether a client's usage is normalized based on similar households prior to determining program eligibility.
  
4. Please reference the Application, at page 6, paragraph 17. Please provide an explanation of why the benefit level increases in year 4 and 5.
  
5. Please reference the Application. Please provide the following information regarding program participants:
  - A. Average client household income level,
  - B. Average client household size (number of persons),

C. Average client household electrical usage per month, and

D. Average square footage of client dwelling (if known).

6. Please reference the Application, at page 10, paragraph 24. Please indicate what types of weatherization services are offered to eligible clients by the company or otherwise. Do any of these programs require the participant to pay a fee for the weatherization services? If not, why?

7. Please explain the differences between the program proposed herein by Louisville Gas and Electric Company and that proposed by its sister company, Kentucky Utilities Company. For any differences noted, please provide an explanation of why such differences exist between the two programs and whether such differences are to be eliminated in any renewal of these programs in the future.