

416 W. Muhammad Ali Blvd., Suite 300, Louisville, Kentucky 40202 www.laslou.org Phone (502) 584-1254 Toll Free (800) 292-1862 Fax (502) 584-8014

Jeffrey A. Been Executive Director

Meagen Peden Agnew Development Director

Leslie G. Clemons Managing Attorney Volunteer Lawyer Program

Stefanie A. Coomes Information Technology Manager

> Carolyn A. Dean Controller

Patricia A. Kennedy Director of Human Resources and Administration

> **Ronald Marstin** Managing Attorney Urban Division

S. Stewart Pope Advocacy Director

Robert Frederick Smith Managing Attorney Rural Division

> Attorneys Andre Bergeron Jeffrey S. Brown Lea D. Hardwick Gwendolyn Horton Lisa Kilkelly Pat Moran Molly Oberhausen Eileen L Ordover Neva-Marie Polley Jeffrey B. Segal Barbara A. Sullivan Amy Karn Turner Rita J. Ward Stephanie C. Willis John Young

Paralegals Emily Brite Roy Denny Carol Dupin Catherine M. Ford fustin fanes Virginia Jordan Rachel Popham Andrea Y. Robbins MaryAnn Werling Alberta H. White

Wyatt, Tarrant & **Combs Fellow:** Shawna Scheidel

IOLTA Fellows: Nellie McCall Betsy Janes

₩LSC



March 19, 2008

VIA EXPRESS MAIL

Ms. Elizabeth O'Donnell, Executive Director RECEIVED Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615

MAR 2 0 2008

PUBLIC SERVICE COMMISSION

RE: In the Matter of:

AN INVESTIGATION OF THE ENERGY AND REGULATORY ISSUES IN SECTION 50 OF KENTUCKY'S 2007 ENERGY ACT, CASE NO. 2007-00477

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are an original and ten (10) copies of the Response of the Association of Community Ministries ("ACM") and People Organized and Working for Energy Reform ("POWER") to the First Data Request of Commission Staff to ACM and POWER.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Ni Kehele

Lisa Kilkelly Attorney for POWER and ACM

Cc: parties of record



416 W. Muhammad Ali Blvd., Suite 300, Louisville, Kentucky 40202 www.laslou.org Phone (502) 584-1254 Toll Free (800) 292-1862 Fax (502) 584-8014

Jeffrey A. Been Executive Directo

Meagen Peden Agnew **Development Director**

Leslie G. Clemons Managing Attorney Volunteer Lawyer Program

Stefanie A. Coomes Information Technology Manage

> Carolyn A. Dean Controller

Patricia A. Kennedy Director of Human Resources and Administration

> **Ronald Marstin** Managing Attorney Urban Division

> S. Stewart Pope Advocacy Director

Robert Frederick Smith Managing Attorney Rural Division

> Attorneys Andre Bergeron Jeffrey S. Brown Lea D. Hardwick Gwendolyn Horton Lisa Kilkelly Pat Moran Molly Oberhausen Eileen L Ordover Neva-Marie Pollev Jeffrey B. Segal Barbara A. Sullivan Amy Karn Turner Rita J. Ward Stephanie C Willis John Young

Paralegals Emily Brite Roy Denny Carol Dupin Catherine M. Ford Justin Janes Virginia Jordan Rachel Popham Andrea Y. Robbins MaryAnn Werling Alberta H. White

Wyatt, Tarrant & **Combs Fellow:** Shawna Scheidel

> **IOLTA Fellows:** Nellie McCall Betsy Janes





March 19, 2008

VIA EXPRESS MAIL

Ms. Elizabeth O'Donnell, Executive Director RECEIVED Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615

MAR 2 n 2008 PUBLIC SERVICE COMMISSION

RE: In the Matter of: AN INVESTIGATION OF THE ENERGY AND REGULATORY ISSUES IN SECTION 50 OF KENTUCKY'S 2007 ENERGY ACT, CASE NO. 2007-00477

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are an original and ten (10) copies of the Response of the Association of Community Ministries ("ACM") and People Organized and Working for Energy Reform ("POWER") to the First Data Request of Commission Staff to ACM and POWER.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Din Keheli _

Lisa Kilkelly Attorney for POWER and ACM

Cc: parties of record

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Response of ACM and POWER to the First Data Request of Commission Staff was served on the following parties on the <u>1971</u> day of March, 2008 by United States mail, postage prepaid.

<u>Lisa Kilkelly</u>

Lonnie E. Bellar Vice President – State Regulation E.ON U.S. Services, Inc. 220 West Main Street Louisville, KY 40202

David F. Boehm Michael L. Kurtz Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

Michael H. Core Big Rivers Electric Corporation President/CEO 201 Third Street P.O. Box 24 Henderson, KY 42420

John J. Finnigan, Jr. Duke Energy General Counsel 139 East Fourth Street, R. 25 At II P.O. Box 960 Cincinnati, Ohio 45201-0960

Dennis Howard II Lawrence W. Cook Paul D. Adams Office of the Attorney General 1024 Capital Center Drive, Suite 200 Frankfort, KY 40601-8204 Tyson Kamuf Sullivan, Mountjoy, Stainback & Miller, 100 St. Ann Building P.O. Box 727 Owensboro, KY 42302-0727

James C. Lamb Senior Vice President East Kentucky Power Cooperative 4775 Lexington Road P.O. Box 707 Winchester, KY 40392-0707

Charles A. Lile Corporate Counsel East Kentucky Power Cooperative 4775 Lexington Road P.O. Box 707 Winchester, KY 40392-0707

Timothy C. Mosher President – Kentucky Power American Electric Power 101A Enterprise Drive P.O. Box 5190 Frankfort, KY 40602

Mark R. Overstreet Stites & Harbison 421 West Main Street P.O. Box 634 Frankfort, KY 40602-0634 Kendrick R. Riggs Stoll Keenon Ogden PLLC 2000 PNC Plaza 500 West Jefferson Street Louisville, KY 40202-2828

Allyson K. Sturgeon Senior Corporate Attorney E.ON U.S. LLC 220 West Main Street Louisville, KY 40202

Patty Walker Senior Vice President Duke Energy Kentucky, Inc. 139 East Fourth Street, EX 400 Cincinnati, OH 45202

Joe F. Childers Getty & Childers, PLLC 1900 Lexington Financial Center 250 West Main Street Lexington, KY 40507

John M. Dosker General Counsel Stand Energy Corporation 1077 Celestial Street, Suite 110 Cincinnati, OH 45202-1629

Stephen A. Sanders Appalachian Citizens Law Center, Inc. 52 Broadway, Ste. B Whitesburg, KY 41858

RECEIVED

MAR 2 0 2008 PUBLIC SERVICE COMMISSION

In the Matter of: AN INVESTIGATION OF THE) ENERGY AND REGULATORY) **ISSUES IN SECTION 50 OF**) KENTUCKY'S 2007 ENERGY ACT)

CASE NO. 2007-00477

RESPONSE OF ACM AND POWER TO COMMISSION STAFF'S FIRST DATA REQUEST

FILED MARCH 20, 2008

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

)

)

)

)

In the Matter of:

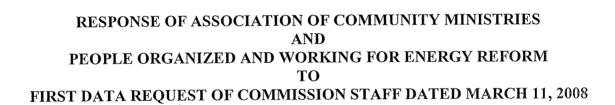
RECEIVED

MAR 2 0 2008

PUBLIC SERVICE COMMISSION

AN INVESTIGATION OF THE ENERGY AND REGULATORY ISSUES IN SECTION 50 OF KENTUCKY'S 2007 ENERGY ACT

ADMINISTRATIVE CASE NO. 2007-00477



Filed: March 20, 2008

ASSOCIATION OF COMMUNITY MINISTRIES AND PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM

CASE NO. 2007-00477

Response to First Data Request of Commission Staff Dated March 11, 2008

Question No. 1

Responding Witness: Marlon Cummings

Q-1. Refer to the testimony of Marlon Cummings at page 5. Mr. Cummings discusses some general benefits of low-income weatherization programs and recommends the expansion of such programs. Does Mr. Cummings have any economic information to provide regarding the cost effectiveness of weatherization programs? Explain your answer.

A-1. The Association of Community Ministries, Inc. (ACM) has limited economic information regarding the cost effectiveness of weatherization programs. ACM does not provide direct weatherization programs, however, several of its member agencies host weatherization workshops for low income clients conducted by Project Warm. Project Warm is a local nonprofit agency which provides weatherization services and energy conservation information to low and fixed income households in the Louisville Metro area. Project Warm workshops provide, at no cost to clients, weatherization training and materials for households that are able to help themselves. Project Warm also has two programs that provide staff and volunteers to visit households in order to identify key areas of air loss around dwellings and make energy repairs.

Because ACM agencies do not conduct weatherization services directly, I do not have specific economic information about the costs of providing these services. But as Executive Director of Jeffersontown Area Ministries, an ACM member agency, I have observed the cost savings that our clients can receive from such programs.

One of my agency's clients, received energy repairs in January 2008. This client is a single mother of two children living in a rental home with monthly income of \$1,157 from disability. Project Warm came to her home on January 28 and sealed air leaks around her windows and doors. Her LG&E bill, dated January 29th was for \$201.74. The average temperature for the billing cycle was 35 degrees. She received her next bill on February 27th for \$149.52 and the average temperature was 37 degrees. This is a savings of \$52.22 or a 25% reduction. Our client also stated that her home was more comfortable. This is only one example of the cost savings for low income households that can result from weatherization activities.

VERIFICATION

COMMONWEALTH OF KENTUCKY)) SS: COUNTY OF JEFFERSON)

The undersigned, Marlon Cummings, being duly sworn, deposes and says that he is Treasurer of the Board of Directors of Association of Community Ministries, that he has personal knowledge of the matters set forth in the foregoing response, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Mailon Curry my 3 MARLON CUMMINGS

Subscribed and sworn to before me, this //2 day of March, 2008.

Ankliely OTARY PUBLIC

NOTARY PUBLIC KENTUCKY STATE AT LARGE

My Commission expires: <u>Januar</u> 8, 2009.