

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

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PUBLIC SERVICE
COMMISSION

In the Matter of:

**EAST KENTUCKY POWER COPERATIVE)
INC.'S FILING TO RESUME THE DEMAND-)
SIDE MANAGEMENT DEMONSTRATION) CASE NO. 2007-00553
PROJECT FOR DIRECT LOAD CONTROL OF)
WATER HEATERS AND AIR CONDITIONERS)
WATER INTAKE SYSTEM AT COOPER POWER)
STATION IN PULASKI COUNTY, KENTUCKY)**

ATTORNEY GENERAL'S REQUEST FOR INFORMATION

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 E.ON U.S., LLC and its party-subsiidiaries, 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.

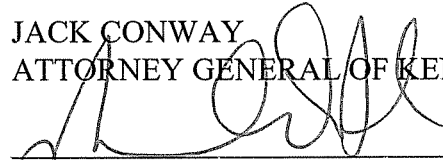
(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(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,

JACK CONWAY
ATTORNEY GENERAL OF KENTUCKY

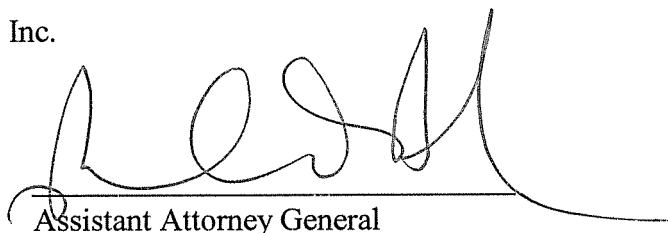


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CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this the 1st day of February 2008, I have filed the original and ten copies of the foregoing Attorney General's Request for Information 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.

Honorable David A. Smart
Honorable Charles A. Lile
East Kentucky Power Cooperative, Inc.
P.O. Box 707
Winchester, Kentucky 40392-0707



Assistant Attorney General

REQUEST FOR INFORMATION

Case No. 2007-00553

1. Please reference the Application, Section II, at page 2. Provide a copy of the GoodCents Solutions final report on the program.
2. Please reference the Application, Section II, at page 2. Explain in detail why the final report from GoodCents Solutions was not included in the application.
3. Please reference the Application, Section II, at page 2. State whether the data used in the report was actual or estimated. If the data was estimated, please explain why actual data was not used for calculating energy savings?
4. Please reference the Application, Section II, at page 2. Explain how the different cycling strategies (33% and 50%) were chosen.
 - a. Were participants notified of the level of control for air conditioning/heat pumps and/or water heaters?
 - b. How?
 - c. Provide copies of all materials furnished to participants regarding this issue.
5. Please describe the type of educational materials and/or information furnished to customers participating in the program. Provide copies of all materials furnished to participants.
6. Please describe what types of customer information are collected under the program.
 - a. Does the Company have a policy regarding the dissemination of customer information?
 - b. If so, provide a copy of said policy. If not, please explain why not?
7. Please provide a cost breakdown for all program administration, development and evaluation costs associated with the Company's DSM programs (such breakdown need not disclose individual salaries of personnel employed by the Company).
8. Please provide an organizational chart illustrating personnel and position titles for employees associated with the Company's DSM programs along with a description of duties for each of the identified positions.
9. Please explain in detail how this program is significant to the Company's integrated resource planning.

10. Please reference the Application, Section II, at page 2. Estimate the cost of providing electrical service during the control periods in lieu of control of the appliances in the program.
 - a. Provide the supporting calculations and assumptions required to arrive at this number.
11. Please reference the Application, Section II, at page 2. Describe in detail any and all benefits to individuals participating in the program.
12. Please reference the Application, Section II, at page 2. Describe in detail any and all benefits to the Company resulting from the operation of the program.
13. Please refer to the Application, Section II, at page 4. Concerning the statement “the level of energy reduction during the study period was minimal. It is estimated that a very nominal reduction in energy cost (fuel and variable operation and maintenance cost) would result from this program.”
 - a. Please state the estimated energy reduction from the 50,000 participants proposed under a “full scale” program.
 - b. Please state the energy reductions achieved under the pilot program, both in kilowatt-hours and kilowatts, broken down by level of control (i.e., 33% and 50%).
 - c. Please state the estimated reduction in energy cost (fuel and variable operation and maintenance cost) that would result from a full scale program.
 - d. If the program has minimal effects on energy reduction and nominal effect on energy costs, please explain in detail the Company’s rationale for continuing the program.
14. Please reference the Application, Section II, at page 3. It appears from the data provided that the energy reductions achieved by the Company were nominal; please state in detail why the Company has chosen to pursue continuation of the pilot program and implementation of a full scale program.
15. Please reference the Application, Section IV, at page 5. State whether customer surveys were utilized to determine customer satisfaction. If so, please provide copies of all survey questions and a summary of the data obtained from said survey. If not, explain in detail why not.
16. Please reference the Application, Section IV, at page 5. State in detail whether the Company believes that the number of participants requesting removal of the control devices is a valid method to determine level of customer satisfaction with the program.

17. Please reference the Application, Section VI, at page 7. State the simple economic payback for the expenditures assumed under the full scale program analysis. Provide all back up documents and calculations.
18. Please reference the Application, Attachment I, at page 1. Provide the total program cost in the first year of operation of a full scale program.
19. Please reference the Application, Attachment I, at page 1. Provide the breakdown of the participant levels assumed under each year of the analysis.
20. Please reference the Application, Attachment I, at page 1. Provide the breakdown of the energy reductions assumed under each year of the analysis.
21. Please reference the Application, Attachment I, at page 1. Provide a breakdown of the operation and maintenance costs under each year of the analysis.
22. Please reference the Application, Attachment I, at page 1. Provide a breakdown of the fuel cost savings and any other savings to the Company under each year of the analysis.
23. Please reference the Application, Attachment I, at page 1. Provide a simple economic payback of the estimated \$323.00 new participant cost.
24. Please reference the Application, Attachment I, at page 1. Provide the cost to provide electricity estimated to be saved under the full scale program.
25. Please refer to the Application at page 28. State whether the Company intends to claim a lost sales component from this program. If so, please provide an estimate of the Company's lost sales.