

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN) CASE NO. 2008-00251
ADJUSTMENT OF BASE RATES)

**RESPONSE OF CAC TO DATA REQUESTS
SERVED ON THEM BY COMMISSION STAFF**

Comes now Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576, by counsel, and for its response to the Data Requests served upon them by the Commission staff, states as follows:

Data Request No. 1

Page 4 of the Testimony of Jack E. Burch ("Burch Testimony") states that the KU Home Energy Assistance ("HEA") program serves 1,300 KU customers. Page 8 of the Burch Testimony states that the program is able to serve 1,600 KU customers. State which total number of KU customers served is accurate.

Response

Witness: Jack Burch:

The reference on Page 4 of the Burch Testimony was outdated. The HEA program is able to serve 1,600 KU customers.

Data Request No. 2

Page 8 of the Burch Testimony states that increasing the HEA meter charge would allow expansion of services to approximately 4,000 additional customers. Mr. Burch also states on

page 8 that the administering community action agencies have a waiting list of approximately 486 families. Explain why there is a need to expand services to 4,000 families if the current waiting list is 486 families.

Response

Witness: Jack Burch

Reference page 7 of the Burch Testimony where it is established with Census Data and Company figures that there are more than 73,000 low-income KU customers, most of whom would be eligible for the HEA program. Expanding services to 4,000 families would hardly make a dent in serving the number of KU customers in need of a subsidy assistance program. For example, from July 1, 2007 to June 30, 2008, Community Action Council provided energy assistance to 3,952 KU customers just in its four-county service area. Expanding the HEA program would, in fact, reduce the burden on LIHEAP and other energy assistance programs by providing subsidies to low-income customers that help them manage their bills. This allows the Council and other agencies to assist more customers and reduces costly arrearages and shutoffs.

Community Action Council and administering community action agencies manage the HEA waiting list in order to ensure a reasonable process. HEA applications are taken on wait-listed customers, making it impractical to indefinitely grow the waiting list. An extensive waiting list of thousands of families would also serve only to frustrate those KU customers who apply for the HEA program but have little realistic chance of ever being enrolled in the program. As of December 1, 2008, the waiting list had increased to 715.

VERIFICATION

I have read the foregoing Responses and they are true and correct to the best of my knowledge and belief.



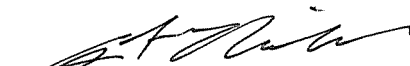
JACK E. BURCH

Subscribed and sworn to before me by Jack E. Burch on this the 3rd day of December, 2008.

My commission expires: June 25, 2009



NOTARY PUBLIC, STATE AT LARGE



JOE F. CHILDERS

GETTY & CHILDERS, PLLC
1900 Lexington Financial Center
250 West Main Street
Lexington, KY. 40507
(859) 259-1900

ATTORNEY FOR CAK AND CAC

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail and on counsel for each party by e-mail on this the 3rd day of December, 2008:

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

Hon. Michael L. Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

Hon. Dennis G. Howard, II
Assistant Attorney General
Office of the Attorney General
1024 Capitol Center Drive, Suite 200
Frankfort, Kentucky 40601

Hon. Lisa Kilkelly
Legal Aid Society
416 West Muhammad Ali Boulevard
Suite 300
Louisville, Kentucky 40202

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

Robert M. Watt III
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, Kentucky 40507-1801

Kendrick R. Riggs
W. Duncan Crosby III
Stoll Kennon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828

David C. Brown
Stites & Harbison, PLLC
400 West Market Street, Suite 1800
Louisville, KY 40202



JOE F. CHILDERS