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December 3, 2008

VIA HAND DELIVERY

Ms. Stephanie Stumbo, Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

RE: In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY TO FILE  
DEPRECIATION STUDY, CASE NO. 2007-00564  
AND  
APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, INC. FOR AN  
ADJUSTMENT OF ITS ELECTRIC AND GAS BASE RATES, CASE NO. 2008-00252

Dear Ms. Stumbo:

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 Data Request of Louisville Gas and Electric Company Dated November 14, 2008.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy of this Response 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,

Lisa Kilkelly  
Attorney for POWER and ACM

Cc: parties of record

**Attorneys**

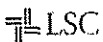
- Andre Bergeron
- Jeffrey S. Brown
- Lea D. Hardwick
- Gwendolyn Horton
- Lisa Kilkelly
- Pat Moran
- Molly Oberhaus
- Eleen L. Orlover
- Sara-Maria Pally
- Jeffrey B. Segal
- Barbara A. Sullivan
- Amy Kim Turner
- Rita J. Ward
- Stephanie C. Willis
- John Young

**Paralegals**

- Emily Britz
- Roy Denny
- Carol Dupin
- Catherine M. Ford
- Justin Jones
- Virginia Jordan
- Rachel Popham
- Andrea Y. Robbins
- MaryAnn Wehring
- Albert H. White

**Wyatt, Tarrant &  
Combs Fellow:**  
Shawn Schindler

**IOLTA Fellows:**  
Suzie McCall  
Betsy James



**RECEIVED,**

**DEC 03 2008**

**PUBLIC SERVICE  
COMMISSION**

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>APPLICATION OF LOUISVILLE GAS</b>	)	
<b>AND ELECTRIC COMPANY TO FILE</b>	)	<b>CASE NO. 2007-00564</b>
<b>DEPRECIATION STUDY</b>	)	
	)	
<b>APPLICATION OF LOUISVILLE GAS</b>	)	
<b>AND ELECTRIC COMPANY</b>	)	<b>CASE NO. 2008-00252</b>
<b>FOR AN ADJUSTMENT OF ITS</b>	)	
<b>ELECTRIC AND GAS BASE RATES</b>	)	

**RESPONSE OF ASSOCIATION OF COMMUNITY MINISTRIES  
AND  
PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM  
TO  
DATA REQUEST OF LOUISVILLE GAS AND ELECTRIC COMPANY  
DATED NOVEMBER 14, 2008**

**Filed: December 3, 2008**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response of ACM and POWER to Data Request of Louisville Gas and Electric Company dated November 14, 2008 was served on the following parties on the 3rd day of December, 2008 by United States mail, postage prepaid.

  
\_\_\_\_\_  
Lisa Kilkelly

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Vice President – State Regulation  
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**ASSOCIATION OF COMMUNITY MINISTRIES AND PEOPLE ORGANIZED  
AND WORKING FOR ENERGY REFORM**

**CASE NO. 2007-00564**

**CASE NO. 2008-00252**

**Response to Data Request of Louisville Gas and Electric Company  
Dated November 14, 2008**

**Question No. 1**

**Responding Witness: Marlon Cummings**

Q-1. To the extent not previously provided, please provide electronic copies (on CD) all workpapers and supporting documentation used and relied upon by the Association of Community Ministries and People Organized and Working for Energy Reform in the preparation of its testimony. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.

A-1. See attached.





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

**CASE NO. 2007-00564  
CASE NO. 2008-00252**

**Response to Data Request of Louisville Gas and Electric Company  
Dated November 14, 2008**

**Question No. 2**

**Responding Witness: Marlon Cummings**

Q-2. Please provide a resume or curriculum vitae, showing Mr. Cummings's professional background and experiences, and education and training.

A-2. I, Marlon Cummings, am the Executive Director of Jeffersontown Area Ministries ("JAM"). I have been in this position since 1995. I received training under the umbrella of Fern Creek/Highview United Ministries from 1993 to 1995 and was the incorporator of JAM. JAM is a crisis intervention program which provides emergency utility and rental assistance and a variety of other social services to residents in the Jeffersontown area. JAM is a current member of the Association of Community Ministries ("ACM"). I have been on the Board of Directors of ACM since 1994. I served the Jeffersontown Christian Church (Disciples of Christ), from 1985 until 1996, as the Minister of Youth and Families. I have a Bachelor of Arts in Business from Bellarmine University and received my Minister's license from the Kentucky Region of the Christian Church (Disciples of Christ) in conjunction with the Lexington Theological Seminary.



**ASSOCIATION OF COMMUNITY MINISTRIES AND PEOPLE ORGANIZED  
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CASE NO. 2008-00252**

**Response to Data Request of Louisville Gas and Electric Company  
Dated November 14, 2008**

**Question No. 3**

**Responding Witness: Marlon Cummings**

Q-3. Please provide according to each fiscal year, the base, contingency and total amount of Low Income Home Energy Assistance Program ("LIHEAP") funds allocated to Kentucky from 2000 through 2009.

A-3. ACM agencies do not administer or distribute LIHEAP funds and do not have the information requested. In Kentucky, the Cabinet for Health and Family Services Department for Community Based Services through its Division of Family Support contracts with Community Action Agencies across the state for distribution of these funds. Further information may be obtained from the:

Department for Community Based Services  
Division of Family Support  
275 E. Main Street, 3E-I  
Frankfort, Kentucky 40621  
Telephone: (502) 564-7514

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**ASSOCIATION OF COMMUNITY MINISTRIES AND PEOPLE ORGANIZED  
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**CASE NO. 2007-00564**

**CASE NO. 2008-00252**

**Response to Data Request of Louisville Gas and Electric Company  
Dated November 14, 2008**

**Question No. 4**

**Responding Witness: Marlon Cummings**

Q-4. Please describe what, if any, financial contributions are made by the Commonwealth of Kentucky for the purpose of funding any LIHEAP type of assistance to low income households.

A-4. ACM agencies do not receive funding from the Commonwealth of Kentucky. ACM is unaware of financial contributions made by the Commonwealth of Kentucky for the purpose of funding any LIHEAP type of assistance to low income households.



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

**CASE NO. 2007-00564**

**CASE NO. 2008-00252**

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Dated November 14, 2008**

**Question No. 5**

**Responding Witnesses: Marlon Cummings and Robert Crutcher, Chairman of  
POWER**

Q-5. Please describe the actions by Association of Community Ministries and People Organized and Working for Energy Reform to encourage or persuade federal or state legislatures to maintain or increase LIHEAP funding for each fiscal year.

A-5. ACM and POWER have not engaged in activities to encourage or persuade federal or state legislatures to maintain or increase LIHEAP funding for each fiscal year. ACM agencies do not receive LIHEAP or state dollars to fund their emergency assistance payments to LG&E. ACM member agencies provide a diverse array of emergency assistance including LG&E, water, housing, and medical necessities to low income persons in Louisville Metro, so ACM's legislative efforts to secure funding are not focused on LIHEAP but on Louisville Metro Government funding of all Community Ministries. ACM efforts to secure state funding have not been successful.





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

**CASE NO. 2007-00564**

**CASE NO. 2008-00252**

**Response to Data Request of Louisville Gas and Electric Company  
Dated November 14, 2008**

**Question No. 6**

**Responding Witness: Marlon Cummings**

Q-6 Please state whether the recently announced increase in LIHEAP funds for Kentucky this year will allow additional low income households to benefit and if so the number of additional households that will benefit compared to the number of households that benefited from available LIHEAP funds last year.

A-6. Because ACM agencies do not administer or distribute LIHEAP funds, we do not know how additional funds will be distributed and what effect this will have on the number of households that benefit. In Kentucky, the Cabinet for Health and Family Services Department for Community Based Services through its Division of Family Support contracts with Community Action Agencies across the state for distribution of these funds. Further information may be obtained from the:

Department for Community Based Services  
Division of Family Support  
275 E. Main Street, 3E-1  
Frankfort, Kentucky 40621  
Telephone: (502) 564-7514