## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER	)	
COOPERATIVE, INC. FOR CONTINUATION OF	)	CASE NO
THE TOUCHSTONE ENERGY HOME	)	2009-00250
PROGRAM, INCLUDING THE REBATE	)	
PROVISIONS	•	

## INITIAL DATA REQUEST OF COMMISSION STAFF TO EAST KENTUCKY POWER COOPERATIVE, INC.

East Kentucky Power Cooperative, Inc. ("East Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

East Kentucky shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which East Kentucky fails or refuses to furnish all or part of the requested information, East Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

- 1. Concerning the recovery of program costs:
- a. While preparing the application in this case, did East Kentucky give any consideration to seeking cost recovery of the program costs as provided under KRS 278.285? Explain the response.
- b. If East Kentucky does not plan to seek recovery of the DSM program costs, explain in detail why East Kentucky decided against seeking cost recovery under KRS 278.285.
- c. What costs, if any, of the program were included in test-year calculations filed in Case No. 2008-00409?<sup>1</sup> What was the amount of those costs?

<sup>&</sup>lt;sup>1</sup> Case No. 2008-00409, General Adjustment of Electric Rates of East Kentucky Power Cooperative, Inc. (Ky. PSC Mar. 31, 2009)

- 2. What outside means (i.e., federal grants, corporate sponsorships, etc.) have been used to fund this rebate program? If any, provide the name and amount of funds received by year.
- 3. Provide a breakdown of customer participation, by member-company, that includes how many customers have received rebates and the amounts of those rebates.
- 4. Refer to East Kentucky's Application, Exhibit 1, page 3 of 4. East Kentucky estimates that members can save as much as 30 percent each month on their electric usage. Provide any workpapers associated with the determination of energy savings attributable to this program to date.
- a. Calculate the associated dollar value of estimated savings to date for the program.
- b. Calculate the dollar value of expected future savings associated with the program for 2009-2025.
- c. Using the expected future savings, calculate the net present value of the program, showing all calculations and assumptions.
- 5. Provide the total dollar amount of rebates paid by East Kentucky since March, 2007.
- 6. Provide a copy of all marketing materials and brochures currently used by East Kentucky to promote Energy Star or energy-efficient homes.
- 7. Explain whether East Kentucky plans any change in its marketing materials or marketing efforts for promotion of its Touchstone Energy Home Program.

8. Does East Kentucky or its member cooperatives promote its Touchstone

Energy Home Program to builders?

a. If yes, explain whether it is East Kentucky or its cooperative that

contacts the builder and describe the effort that goes into such a promotion.

b. Explain whether any incentive is paid to builders that adhere to

Energy Star construction standards.

c. Is any marketing material distributed to builders that is directed at

the builder, rather than the homebuyer? If yes, provide a copy of the marketing

material.

9. Refer to page 4 of the Hohman Testimony. Provide any data supporting

the claim that there is a trend toward increased "green building" in Kentucky.

Seff/Derouen

Executive Director

Public Service Commission

P.O. Box 615

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DATED: \_AUG 2 1 2009

cc: All Parties

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