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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

MAY 0 4 2010 PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY POWER)
COMPANY FOR A GENERAL ADJUSTMENT) CASE NO. 2009-00459
OF ELECTRIC RATES)

CAK'S RESPONSES TO FIRST DATA REQUESTS FROM COMMISSION STAFF

Pursuant to the Commission's Procedural Order, Community Action Kentucky, Inc.

(CAK) hereby submits its CAK's Responses To First Data Requests From Commission Staff:

1. Refer to the Direct Testimony of Roger McCann ("McCann Testimony"), pages 2 and 3. These pages include the amount of federal funding for the Low-Income Home Energy Assistance Program, the number of households assisted, the number of households unable to be served, and resources for this program provided by the Kentucky General Assembly for recent heating seasons. However, the same type of information was not provided for the 2009-2010 heating season. To the extent it is available, provide the same information for the 2009-2010 heating season.

RESPONSE: During the 2009 LIHEAP Subsidy Season, Community Action Agencies in Kentucky provided Subsidy benefits totaling \$17,019,093.00 to 118,089 households made up of 265,235 individuals. During the 2010 LIHEAP Crisis Component, Community Action Agencies in Kentucky provided Crisis benefits totaling \$44,418,272.00 to 134,061 households made up of 329,100 individuals.

2. Refer to page 7 of the McCann Testimony, which includes Mr. McCann's

recommendations regarding Kentucky Power Company's proposed increase.

a. Mr. McCann would recommend "a significant decrease in the proposed rate increase for residential electric customers, and a more fair distribution of the proposed increase among all three rate classes." Identify the "three rate classes" to which Mr. McCann is referring.

RESPONSE: The three rate classes referred to in Mr. McCann's testimony include i) residential, ii) commercial, and iii) industrial.

b. Mr. McCann recommends an expansion of demand-side management programs but does not provide specific recommendations. If Mr. McCann has specific recommendations, provide them.

RESPONSE: Mr. McCann has no specific recommendations to provide at this time.

c. Mr. McCann recommends an increase in the per-meter charge for the energy assistance program, as well as a matching shareholder contribution, but does not provide specific recommendations. If Mr. McCann has specific recommendations, provide them.

RESPONSE: The total amount of funds available for the Home Energy Assistance program in the Kentucky Power Company service area needs to be significantly increased. This can be accomplished either by shareholder contributions or an increase in the per meter charge. Mr. McCann proposes a tripling of the amount of money available to the fund, given the magnitude of the proposed rate increase and the severe effect this increase is likely to have on low income ratepayers, who make up a large plurality of all ratepayers in the service area. Even with a

tripling of the program, the needs of the low income ratepayers will far outstrip the available funds.

I hereby certify that the above responses are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

ROGER McCANN

COMMONWEALTH OF KENTUCKY COUNTY OF FRANKLIN

Subscribed and sworn to before me by Roger McCann on this the 4th day of May, 2010.

My commission expires: 5/12/10

NOTARY PUBLIC, STATE AT LARGE

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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 on this the 4th day of May, 2010:

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