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PUBLIC SERVICE  
COMMISSION

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May 20, 2010

Docket Clerk  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

In the Matter of: APPLICATION OF LOUISVILLE GAS AND  
ELECTRIC COMPANY FOR AN ADJUSTMENT OF ELECTRIC  
AND GAS BASE RATES, Case No. 2009-00549

Dear Docket Clerk:

Enclosed please find for filing eleven (11) duplicate originals of AARP's Response to the First Set of Data Requests of Louisville Gas and Electric Company, and of AARP's Response to the First Set of Data Requests of Commission Staff. All parties of record have been served.

Thanks in advance for your assistance.

Cordially,

Tom FitzGerald  
Director

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

**In the Matter of:**

**APPLICATION OF LOUISVILLE GAS AND  
ELECTRIC COMPANY FOR AN ADJUSTMENT  
OF ELECTRIC AND GAS BASE RATES**

)  
)  
) **CASE NO. 2009-00549**  
)  
)

**RESPONSE OF AARP TO  
FIRST DATA REQUEST OF COMMISSION STAFF**

**RECEIVED**

**MAY 21 2010**

**PUBLIC SERVICE  
COMMISSION**

Mailed: May 19, 2010

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

APPLICATION OF LOUISVILLE GAS & ELECTRIC ]  
CO. FOR AN ADJUSTMENT OF ITS ELECTRIC AND ]  
GAS BASE RATES]

Case No. 2009-00549

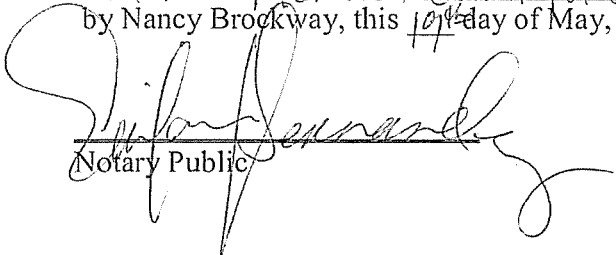
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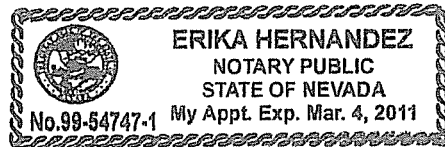
I hereby affirm and verify that the foregoing responses to Data Requests propounded to me in the Matter of: Adjustment of Rates of Louisville Gas & Electric Co., Case No. 2009-00549, are true and accurate to the best of my information and belief.

  
Nancy Brockway

Subscribed and sworn to before me, a notary public in the

STATE of Nevada, County of Clark  
by Nancy Brockway, this 10<sup>th</sup> day of May, 2010.

  
Notary Public



My commission expires March 4, 2011 -

## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies have been mailed for filing by first-class mail and that a true and correct copy has been served by first-class mail upon the following parties of record this 19<sup>th</sup> day of May, 2010:

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Hon. Tom FitzGerald  
On behalf of AARP

**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2009-00549**

**Response of AARP to First Data Request Of Commission Staff**

**Responding Witness: Nancy Brockway**

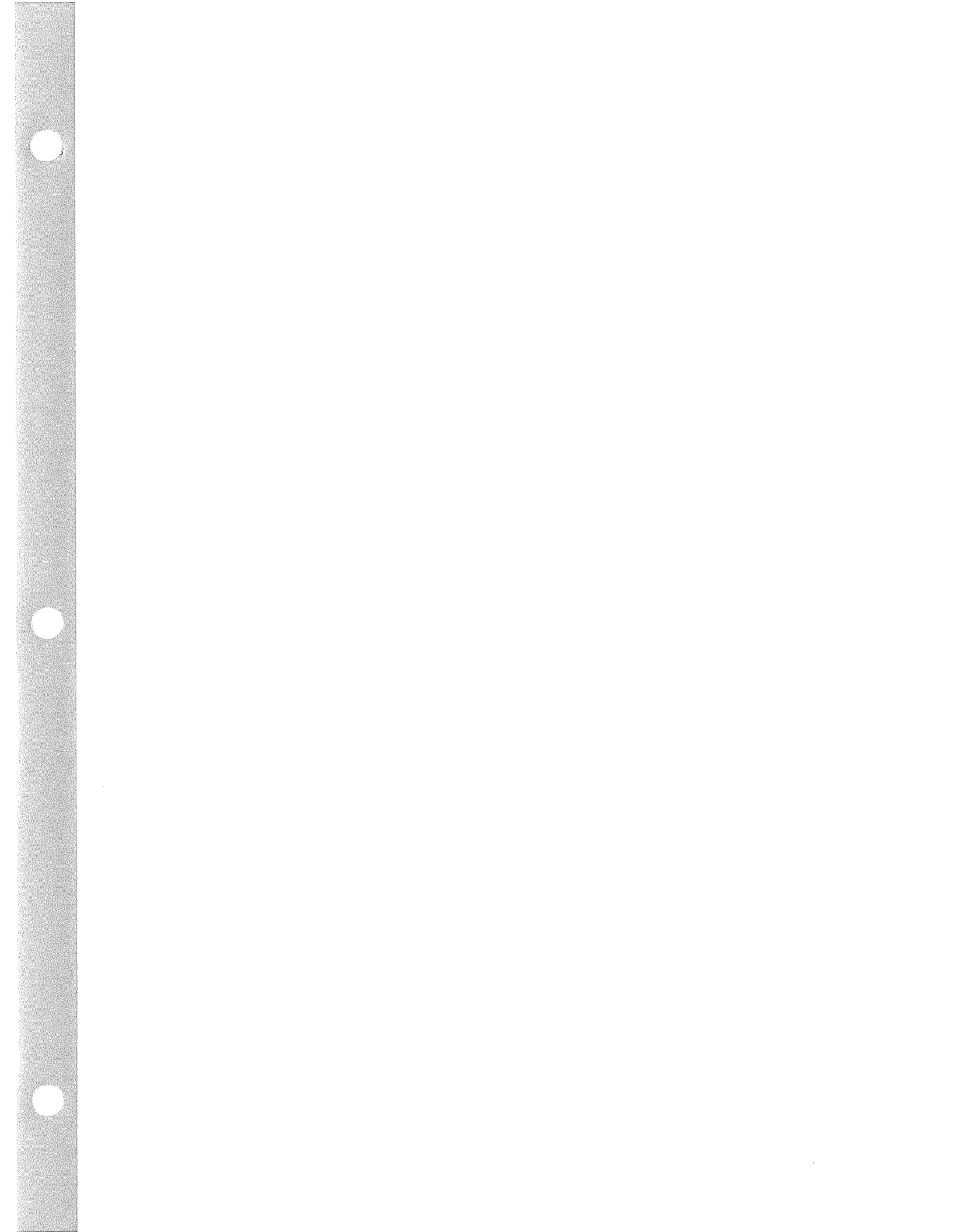
Question 1.

Refer to pages 17 and 18 of the Direct Testimony of Nancy Brockway (“Brockway Testimony”), which indicates that Louisville Gas and Electric Company’s estimated low-income usage level is contrary to much other data. Provide the data on which AARP is relying which shows usage patterns of low-income customers.

Response 1:

Published reports and analyses consistently show that low-income utility customers on average have lower usage than non-low-income customers. Examples of such reports are listed below. Ms. Brockway did not review any particular study in the preparation of her testimony.

- a. Roger D. Colton, *Home Energy Consumption Expenditures by Income (Pennsylvania)*, May 2009, prepared for the Pennsylvania Low Income Utility Project, Harrisburg, PA. Available at [http://www.fsconline.com/downloads/Papers/2009\\_05\\_LowIncomeUsage.pdf](http://www.fsconline.com/downloads/Papers/2009_05_LowIncomeUsage.pdf)
- b. Joy Moses, *Generating Heat Around the Goal of Making Home Energy Affordable to Low Income Americans: Current Challenges and Proposed Solutions*, Center for American Progress, December 2008, available at <http://www.americaspower.org/Issues-Policy/>.
- c. Eugene M. Trisko, *Energy Cost Burdens and American Families*, prepared for the American Coalition for Clean Coal Electricity, February, 2010, available at [http://www.americaspower.org/content/download/2109/18021/file/Energy Cost Burdens on American Families.pdf](http://www.americaspower.org/content/download/2109/18021/file/Energy_Cost_Burdens_on_American_Families.pdf).
- d. Olivia Wein, *Testimony of the National Consumer Law Center, on Behalf of Our Low-Income Clients Before the House Committee on Appropriations Subcommittee on Labor, Health & Human Services, Education, and Related Agencies FY 2010 Appropriations for the Low Income Home Energy Assistance Program*, National Consumer Law Center, 2009, available at [http://www.consumerlaw.org/issues/energy\\_and\\_utility/content/HouseAppropriationsFY2010.pdf](http://www.consumerlaw.org/issues/energy_and_utility/content/HouseAppropriationsFY2010.pdf).



**LOUISVILLE GAS AND ELECTRIC COMPANY**

**CASE NO. 2009-00549**

**Response of AARP to First Data Request Of Commission Staff**

**Responding Witness: Nancy Brockway**

Question 2.

Refer to page 19, lines 6 and 7, of the Brockway Testimony. Provide the information on which AARP is relying which shows the adoption of straight fixed variable rate design nationwide.

Response 2:

Ms. Brockway is relying on her general knowledge as an expert in utility matters.