

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

In the Matter of:

JUN 02 2011

JOINT APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY AND KENTUCKY)
UTILITIES COMPANY FOR REVIEW,)
MODIFICATION, AND CONTINUATION OF)
EXISTING, AND ADDITION OF NEW DEMAND-)
SIDE MANAGEMENT AND ENERGY)
EFFICIENCY PROGRAMS)

**PUBLIC SERVICE
COMMISSION**

CASE NO. 2011-00134

ATTORNEY GENERAL'S INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits these Initial Requests for Information to Louisville Gas & Electric Co. ["LG&E"] and Kentucky Utilities Co. ["KU"] (hereinafter jointly referred to as "Joint Applicants") to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following instructions:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness(es) who will be prepared to answer questions concerning each request.

(3) Please repeat the question to which each response is intended to refer. The Office of the Attorney General can provide counsel for Joint Applicants with an electronic version of these data requests, upon request.

(4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or 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.

(6) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(7) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(10) As used herein, the words "document" or "documents" are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts

thereof) and if the original is not available, the best copy available. These terms include all information regardless of the medium or media in which they are recorded (including electronic media and e-mail), in any written, graphic or other tangible form including, but not necessarily limited to: all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards / records, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing,

drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company:

(a) please identify: (i) the person by whom it was destroyed and/or transferred; (ii) the transferee; and (iii) the person authorizing the destruction or transfer; and

(b) state: (i) the time, place, and method of destruction or transfer; and, (ii) the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

(13) Please provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

Respectfully submitted,
JACK CONWAY
ATTORNEY GENERAL



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Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were mailed via First Class U.S. Mail, postage pre-paid, to:

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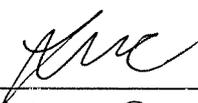
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this ___ day of June, 2011


Assistant Attorney General

**Joint Application of LG&E and KU Regarding Demand-Side
Management and Energy Efficiency Programs
Case No. 2011-00134
Attorney General's Initial Data Requests**

1. Reference the petition, paragraph no. 7, wherein the Joint Applicants state that to date, the existing DSM programs have produced cumulative energy savings of 207,900 MWh, 4 million CCF, and a cumulative demand reduction of 182 MW. For each measure of savings, provide the source in the petition in which these savings are discussed in detail, and provide worksheets quantifying and supporting these conclusions.
2. Regarding par. 17 of the petition, state how the companies to date have accounted for capital expenditures used to advance energy efficiency, which costs the companies now for the first time seek to recover through a "DSM Capital Cost Recovery ["CCR"]." Provide quantifications as needed.
3. Reference the Bellar testimony, p. 8, in which Mr. Bellar states the load control switches and programmable thermostat devices have lives of over one year. Provide the average expected lives for both devices.
4. The companies previously were forced to withdraw a DSM offering of programmable thermostats due to a potential product defect which may have led to one or more home fires. State how the companies accounted for any losses incurred as a result of having to remove and replace the potentially defective products, and indicate how the companies accounted for any such losses. Is the request for approval of a CCR an attempt to collect the companies' losses associated with the potentially defective products?
5. Regarding the companies' proposed CCR, is it not accurate to say that if the proposal is approved as filed, the companies under the funding mechanism would recover 10.5% ROE for capital expenditures under the Residential and Commercial Load Management / Demand Conservation Program, and then would receive an additional 10.5% ROE under the overall DSM cost recovery mechanism? If the companies would not recover a double award of ROE, explain in complete detail how this would not be so, and provide quantifications.
6. Reference the Hornung testimony, p. 20, discussing the proposed Tier 2 and Tier 3 Incentives under the Home Energy Performance Program. Provide the basis for how the companies decided on allowing \$500 for a Tier 2 incentive, and \$1,000 for a Tier 3 incentive.
7. Regarding the residential refrigerator removal program, clarify whether the incentives offered therein are for removal only, or whether the incentive is applied upon the purchase of a new replacement unit.

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8. Regarding the companies' residential high-efficiency lighting program, provide the results of any and all customer satisfaction surveys regarding the brightness of the CFL bulbs which the companies provide. How does the company know the bulbs are actually being used?

9. Regarding the commercial program, the ICF report at p. 30 recommends recruiting small commercial customers through unique marketing efforts, and utilization of real-time pricing. Describe any plans the companies may have to implement this recommendation.