COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|---|---|---|
| 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 | ) ) ) ) ) ) ) | CASE NO. 2011-00134 |

COMMISSION STAFF'S SECOND INFORMATION REQUEST TO LOUISVILLE GAS & ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Louisville Gas & Electric Company ("LG&E") and Kentucky Utilities Company ("KU") ("the Companies"), pursuant to 807 KAR 5:001, are to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 11, 2011. 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.

The Companies shall make timely amendment to any prior response if they obtain 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 the Companies fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their 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.

1. Refer to Exhibit MEH-1, Volume 1, pages 19 through 24, of the Companies' April 14, 2011 application ("Application") as to the proposed enhancement of the Residential and Commercial Load Management/Demand Conservation Program. On page 22, customer incentives are monetary and non-monetary. A monetary mechanism is the incentive value range beginning at $20 per year and increasing to a maximum benefit of $40 per year. Non-monetary incentives include I-tune cards, Wal-Mart gift certificates, or prepaid VISA cards.

   a. What determines whether a customer receives $20 per year or the maximum $40 per year? Explain.

   b. Will existing customers who are receiving a $20 per-year incentive be able to receive the maximum $40 per-year incentive? Explain.

   c. Can a customer receive more than one non-monetary incentive and what is the value of the non-monetary incentives? Explain.

d. On page 23 in the discussion of the multi-family option, how will any monetary incentive be split between the property owner and the tenant? Explain.

e. Will the proposed additional program manager be utilized for residential, commercial, or split between the two? Explain.

f. What will the annual compensation and benefits be for the proposed additional program manager? Explain.

g. The program name is Residential and Commercial Load Management/Demand Conservation. Is there any enhancement applicable to commercial customers? Explain.

2. Refer to Exhibit MEH-1, Volume I, page 29, of the Companies' Application as to the proposed enhancement of the Commercial Conservation (Energy Audits)/Commercial Incentives Program. Under 2.7 Customer Incentives, "the maximum annual incentive permitted will be $50,000 per facility. However, the Companies will permit commercial customers to receive multi-year incentives in a single year where such multi-year incentives do not exceed the aggregate amount of $100,000 per facility and no incentive was provided in the immediately preceding year."

a. Explain what a commercial customer might do to receive the maximum annual incentive of $50,000.

b. Explain what a commercial customer might do to receive the multi-year incentive of $100,000 per facility.

c. In footnote 17 at the bottom of page 29, there is a comment that, where appropriate, one customer might be entitled to more than one rebate. Explain.

d. Will the proposed multi-year incentive enhancement affect the DSM commercial rate as compared to the current DSM commercial rate? Explain.

3. Refer to Exhibit MEH-1, Volume I, pages 32 through 36, of the Application concerning the proposed enhancement of the Residential Conservation/Home Energy Performance Program. This program is designed to help customers reduce costs within the home using online or on-site energy audits. The enhanced program is structured to encourage residential customers to reduce energy usage by a targeted 10 percent and the customer will receive performance-driven incentives for an additional 10 and 20 percent in energy savings. Additional savings will be verified by a test out. A test out is the follow-up evaluation, measurement, and verification process completed with a customer to ensure that the recommended energy efficiency measures have been installed correctly and to ensure that the customer will receive the targeted energy reduction. This program would be open to all residential customers with new homes that are at least three years old.

a. What type of installations will be put in place to achieve a targeted 10 percent energy saving in the Tier One On-Site Audit? Explain.

b. How will the Companies know that the 10 percent, Tier One On-Site Audit, targeted energy savings have been achieved, if a test out is performed after the installations have occurred? Explain.

c. How will the Companies know that the additional 10 percent, Tier Two On-Site Audit Incentive, and 20 percent, Tier Three On-Site Audit Incentive, targeted energy savings have been achieved, if a test out is performed after the installations have occurred? Explain.

d. Explain whether the Companies considered a test before the installations, such as a blower door test, be performed before any installations are done in the On-Site Audit? Include in the explanation whether the 10 percent, additional 10 percent, and additional 20 percent targeted energy savings are reasonably attainable goals.

e. Section 3.3 states that the program is open to all residential customers with a new home at least three years old. Explain what is meant by a new home at least three years old.

f. Are there additional IT costs due to the proposed program enhancements? If the answer is yes, explain how these proposed costs will be used.

4. Refer to Exhibit MEH-1, Volume I, pages 38 through 41, of the Application as to the proposed enhancements to the Residential Low Income Weatherization Program (WeCare). This program is an education and weatherization program designed to reduce energy consumption of the LG&E and KU low-income customers. The table below is the customer incentive per tier from page 40.

| Tier | Annual Energy Consumption | Current Allowable Measure Cost | Proposed Allowable Measure Cost |
|---|---|---|---|
| A | Up to 1,299 Ccf or up to 11,499 kWh | $200 | $350 |
| B | 1,300 to 1,800 Ccf or 11,500 to 16,000 kWh | $750 | $1,000 |
| C | Greater than Tier B | $1,700 | $2,100 |

a. With regards to the increase to the proposed allowable measure cost from current allowable measure cost, are these different increases by tier due to an increase in material cost, contractor cost, or to increased participation in this program? Explain.

b. Explain the projected annual program budget increase of $500,000 in Year 1 on page 41.

c. Are there additional IT costs due to the proposed program enhancements? If the answer is yes, explain how these proposed costs will be used.

5. Refer to Exhibit MEH-1, Volume I, pages 43 and 44, of the Application concerning the proposed enhancements to Program Development and Administration. The proposed 2011 annual program budget is shown in the following table:

Program Allocation 2011
Development & Administration

| | | |
|---|---|---|
| LGE: RS et al | 24.4% | $307,524 |
| LGE: RGS et al | 20.6% | $259,931 |
| LGE: GS et al | 3.0% | $38,160 |
| LGE: PS | 0.2% | $2,460 |
| LGE: CTOD et al | 0.0% | $93 |
| LGE: CGS et al | 1.8% | $22,060 |
| KU: RS et al | 41.2% | $519,445 |
| KU: GS | 8.1% | $102,067 |
| KU: AES | 0.1% | $669 |
| KU: PS et al | 0.6% | $8,047 |
| Total | 100.0% | $1,260,456 |

a. Based on the allocation of the 2011 program costs by tariff, is there significant consideration as to commercial program development? Explain.

b. Will the three newly proposed full-time employees be used only in developing and administering residential programs? Explain.

c. Are there additional IT costs due to the proposed program enhancements? If the answer is yes, explain how these proposed costs will be used.

6. Refer to Exhibit MEH-1, Volume I, pages 47 through 50, of the Application. The objective of the proposed new Smart Energy Profile Program will be to educate customers about their energy consumption, encourage the customer to reduce consumption, and empower the customer to use energy more wisely. The program is aimed at approximately 50 percent of the residential LG&E and KU customers. The greatest potential savings are derived from the highest 50 percent of energy users, and that energy users below average energy consumption produce minimal savings.

a. What will be the approximate minimum kWh and Ccf usage that will be considered necessary to possibly participate in this program? Explain. Include in the explanation whether there will be a minimum average monthly usage to participate.

b. Referring to the response to question 6a, will the determination be based on average monthly usage or a high-low analysis over a twelve-month period? Explain.

c. The projected participation goals are listed on page 49 for years one through seven and summarized in the table below. At the end of seven years, there are projected to be 2.015 million participants. From the LG&E and KU website, LG&E serves 321,000 gas customers and 397,000 electric customers in Louisville and sixteen surrounding counties. KU serves 546,000 customers in seventy-seven Kentucky counties and five Virginia counties. Explain how the projected 2.015 million participants were determined in the following table:

| Participants | LG&E Duel Fuel | LG&E Electric Only | KU Electric Only | Total |
|---|---|---|---|---|
| Year 1 | 40,000 | 10,000 | 55,000 | 105,000 |
| Year 2 | 80,000 | 15,000 | 110,000 | 205,000 |
| Year 3 | 80,000 | 15,000 | 110,000 | 205,000 |
| Year 4 | 145,000 | 25,000 | 205,000 | 375,000 |
| Year 5 | 145,000 | 25,000 | 205,000 | 375,000 |
| Year 6 | 145,000 | 25,000 | 205,000 | 375,000 |
| Year 7 | 145,000 | 25,000 | 205,000 | 375,000 |
| Total | 780,000 | 140,000 | 1,095,000 | 2,015,000 |

d. Do LG&E and KU foresee any personal income limitations to participation in this program? Explain.

7. Refer to Exhibit MEH-1, Volume I, pages 52 through 55, of the Application. The objective of the new proposed Residential Incentives Program is to encourage customers to purchase various Energy Star appliances, HVAC equipment, or window films that meet certain requirements, qualifying them for an incentive. The types of items that can be purchased are listed in the following table:

| Description |
|---|
| Heat Pump Water Heaters ("HPWH") |
| Washing Machine |
| Refrigerator |
| Freezer |

Dishwasher

Window Film

Central Air Conditioner

Electric Air-Source Heat Pump

The proposed annual budget for Year 1 through Year 7 is summarized in the following table:

| | Adm Costs ($000) | Implementation ($000) | Incentives ($000) | Misc Costs ($000) | Total ($000) |
|---|---|---|---|---|---|
| Year 1 | $428 | $117 | $943 | $80 | $1,568 |
| Year 2 | $480 | $140 | $1,175 | $51 | $1,846 |
| Year 3 | $616 | $205 | $1,773 | $52 | $2,646 |
| Year 4 | $623 | $205 | $1,773 | $83 | $2,684 |
| Year 5 | $630 | $205 | $1,773 | $54 | $2,662 |
| Year 6 | $637 | $205 | $1,773 | $55 | $2,670 |
| Year 7 | $644 | $205 | $1,773 | $86 | $2,708 |
| Total | $4,058 | $1,282 | $10,983 | $461 | $16,784 |

By each type of item, provide the projected participation and how the costs are to be allocated from Year 1 to Year 7.

8. Refer to Exhibit MEH-1, Volume I, page 52, of the Application, wherein it is stated, "In addition, according to the International Window Film Association, the installation of window films can significantly reduce solar heat gain which result in reduced air conditioning costs and reduced HVAC equipment wear and

tear/maintenance. While window films are not Energy Star rated they can be evaluated based on their shading coefficient (SC), solar heat gain coefficient (SHGC), or various other equivalent criteria (i.e. emissivity)."

a. What led the Companies to consider window film as an option to reducing air conditioning costs and reduced heating, ventilation, and air conditioning equipment wear and tear/maintenance? Explain.

b. What is the estimated life of window film? Explain.

c. Do the Companies have a list of qualified vendors that do window film installation that can be provided to potential LG&E/KU customers? Explain.

d. Upon what types of windows can window film be installed? For example, single or double pane windows, or wood or vinyl frame windows. Explain.

e. Are there maintenance requirements for window film once installed? Explain.

9. Refer to Exhibit MEH-1, Volume I, pages 57 to 60, of the Application concerning the new proposed Refrigerator Program, wherein it is stated at page 57, "The Refrigerator Removal Program is designed to provide removal and recycling of inefficient secondary refrigerators and freezers from LG&E and KU customers households. The removal of these inefficient units will reduce consumption and demand." It is further stated at page 58 , "The program will target customers who are likely to own a secondary refrigerator which is typically stored in a garage or a basement and is not used to full capacity."

a. Even though these secondary units are removed, was there any consideration as to these units being replaced with more energy efficient units, thereby reducing the net energy savings and demand? Explain.

b. Do the lost sales that are calculated on this program consider only the removal of inefficient secondary refrigerators and freezers? Explain.

10. Refer to the Companies' response to Staff's initial request, Item 1, page 2. LG&E's Weighted Average Cost of Capital ("WACC") Grossed Up for Income Taxes is 10.70 percent. The formula given to determine this percentage is {ROR + (ROR - DR) X [TR/(1-TR)]}. Provide the calculation in electronic format with all formulas intact and unprotected.

11. Refer to the Companies' response to Staff's initial information request, Item 1, page 3, Commission Staff Question No. 1. KU's WACC Grossed Up for Income Taxes is 10.32 percent. The formula given to determine this percentage is {ROR + (ROR - DR) X [TR/(1-TR)]}. Provide the calculation in electronic format with all formulas intact and unprotected.

12. Refer to the Companies' response to Staff's initial information request, Item 2, pages 1 and 2. In response to Question No. 2.c., the Companies respond, "The Companies believe it is more appropriate to start recording the costs of load control switches and programmable thermostats as capital costs to appropriately match the costs with benefits over time and, coincidentally, reduce the bill impact of the proposed Load Control Program." In the response to Question 2.a., the Companies state that the depreciable life of the load control switches and programmable thermostats for LG&E is eight years and, for KU, it is fourteen years.

a. If the load control switches and programmable thermostats were not part of the Companies' DSM program, even though they have a useful life of greater than one year, would the Companies still consider capitalizing these items as retirement units using owned asset accounting principles if these items were purchased for a non-DSM program or project? Explain.

b. In the matching of capital costs to benefits over time, how will the Companies fully recover the capital cost of the load control switches and programmable thermostats? Explain.

c. If it were determined that there would be a short-fall of recovery as to the capital costs of the load control switches and programmable thermostats, would the Companies attempt to recover the short-fall through the Companies DSM Balance Adjustment ("DBA")? Explain.

d. Have the Companies considered an annual DSM recovery filing to more fully recover the cost of the capital costs for the load control switches and programmable thermostats? Explain.

13. Refer to the Companies' response to Staff's initial information request, Item 4. The Companies provided proposed Lost Sales component, $10,266,991 for LG&E and $8,047,162 for KU, in an electronic format with billing determinants by tariff. Also, a request was made to provide in an electronic format with all formulas intact for each DBA from Exhibit LEB-1.

a. Provide, in electronic format with all formulas intact, the proposed lost sales of $10,266,991 by program and billing determinant for LG&E.

b. Provide, in electronic format with all formulas intact, the proposed lost sales of $8,047,162 by program and billing determinant for KU.

c. What are the annual LG&E kWh and Ccf and KU kWh energy savings impacts per participant by program? Explain.

d. Were the Companies not able to provide, in electronic format with formulas intact, the various DBAs on the proposed DSM tariffs? Explain.

14. Refer to the Companies' response to Staff's initial information request, Item 4. The Companies state that the Net Lost Revenues Total Amount increase is due to energy savings accumulating as the programs mature over the years, as well as the three new residential programs and their respective savings in 2011. Explain the time period for "over the years."

15. Refer to the Companies' response to Staff's initial information request, Item 5. The Companies discovered that incorrect tax depreciation rates were utilized in calculating rate base. In the Application, Exhibit MEH-1, Volume I, page 24, there are two tables. In table 1.9.1 Residential Annual Program Budget, there are Capital Expenditures shown in the amount of $296,000. In table 1.9.2 Commercial Annual Program Budget, there are Capital Expenditures in the amount of $15,000.

a. What are those capital expenditure amounts using the correct tax depreciation rates? Explain.

b. Provide revised "red-line" and "clean" gas tariff sheets reflecting your response to 15.a. above.

16. Refer to the Companies' response to Staff's initial information request, Item 8, page 2. The Companies state, "Generally speaking, the Companies do not believe it will be necessary to terminate a program mid-year; a program's temporarily poor performance may be improved, and in the event it cannot in a reasonable amount time, the Companies will terminate it during the annual DSM billing adjustment process."

a. Do the Companies revise their DSM rates that appear on the customers' bills annually once the DSM billing adjustment process is completed? Explain.

b. If the answer to 15.a. is yes, confirm that revised DSM tariffs are filed with the Commission once the DSM billing adjustment process is completed.

17. Refer to the Companies' response to Staff's initial information request, Item 11. The Companies instituted litigation in October 2010 to recover some portion of the costs associated with the purchase of load control thermostats. The Companies have incurred $1,986,945 in costs associated with the replacement program of the initial load control thermostats. The 2010 thermostat cost of removal of $1,940,300 for both Companies was placed in the DSM balancing adjustment for 2011.

a. What is the estimated cost of litigation? Explain.

b. Will the cost of litigation be placed in the DSM balancing adjustment or borne by the shareholders? Explain.

18. Refer to the Companies' response to Staff's initial request, Item 16, page 2.

a. How are the Companies progressing toward the goal of 500 MWs of cumulative demand reduction? Explain.

b. The response indicates that 4.5 positions will be added to support existing programs, with an additional burdened labor budget of $723,741.

1) Provide the burdened labor cost for DSM program operation for the most recent calendar year available.

2) Explain whether any DSM program support is currently outsourced or has been considered for outsourcing.

19. Refer to the Companies' response to the Attorney General's ("AG") initial information request, Item 4. The response states that, "The request for the DSM Capital Cost Recovery component is not an attempt to collect any expenses associated with the safety issue," and further, "The request for the DCCR is to allow the Companies to the recovery of capital investments and for a fair, just, and reasonable return on those investments." Explain exactly what LG&E/KU expects to recover from its customers if nothing is recovered from the vendor of the thermostats, including the calculation of the return on the investment as of December 31, 2010, as well as to date. Provide all necessary calculations performed to support your response.

20. Refer to the Companies' response to the AG's initial information request, Item 7. The Companies respond, "Incentives are provided for the removal of working refrigerator or freezers only." If a refrigerator or freezer will run, but not cool or freeze, will it be considered working? Explain.

21. Refer to the Companies' response to the AG's initial information request, Item 8.

a. Describe any follow-up conducted by the Companies, or its agents, to ensure its DSM programs are effective toward the goals of reducing demand, and that following deployment, the programs are satisfactory to the participants. Include the results of any surveys conducted for each existing program.

b. If follow-up is not conducted concerning any existing program, explain why not.

22. Refer to the Companies' response to the Association of Community Ministries, Inc.'s ("ACM") initial information request, Item 12, renters of single-family homes and units in multi-family buildings are eligible for the WeCare Program.

a. Is there a length-of-time requirement as to occupancy regarding the WeCare Program? Explain.

b. If the answer to 22.a. is yes, and a renter does not meet the occupancy requirement, but their lease agreement is for a longer-than-required time period, would the renter then be qualified to participate in the WeCare Program, assuming the landlord agrees? Explain.

23. Refer to the Companies' response to the ACM's initial request, Item 15.

a. Who is the third-party contractor that contacts LG&E customers who are LIHEAP recipients about the WeCare Program?

b. Does KU also use a third-party contractor that contacts KU customers who are LIHEAP recipients about the WeCare Program?

24. Refer to the Companies' response to ACM's initial information request, Item 17. Of the $2.06 electric bill impact resulting from new DSM programs and enhancements, $1.65, or 80 percent, is from the residential lighting program.

a. How does LG&E know that the Residential High Efficiency Lighting Program is the best use of the dollars spent on these new and enhanced programs? Provide all calculations needed to support your response.

b. Given that incandescent bulbs are to be phased out by 2014, does it continue to make sense for the Companies to spend DSM resources on Compact Fluorescent Bulbs or should this be left to the consumer? Explain.

c. What does column heading "DRR" refer to in the table outlining bill impact by program? Explain.

25. Refer to the Companies' response to ACM's initial information request, Item 5. The Companies respond, "Yes, renters are eligible to participate in the Residential Load Management/Demand Conservation Program. Landlord consent is required and the incentives are shared." Do the Companies know how the incentive is shared, for example 50/50? Explain.

26. Refer to the Companies' response to the Community Action Council's ("CAC") initial information request, Item 1. The response includes normalized usage and resultant bill impact of the new and enhanced programs upon the average residential customer. Provide the normalized usage and resultant bill impact upon the average electric bill for an electric space heating customer.

27. Refer to the Companies' response to the CAC's initial information request, Item 3. WeCare participants receive a live telephone survey from a third-party evaluation contractor regarding their experience with the program.

a. Have any contractors been removed from the list? Explain.

b. Provide the results of the survey.

28. Refer to the Companies' response to the Metropolitan Housing Coalition's ("Metro Housing") initial information request, Item 2. Explain the decrease in expenses for the Residential Load Management program from 2009 to 2010.

29. Refer to the Companies' response to the Metro Housing's initial information request, Item 3. The Companies respond that approximately 30 percent of LG&E's customers reside in rental units.

a. What is the approximate percentage of KU residential customers that live in rental units? Explain.

b. Provide for both LG&E and KU the approximate number of residential customers who reside in single-family, site-built homes; manufactured housing; multi-family units; non-profit housing developments; etc.

30. Refer to the Companies' response to Metro Housing's initial information request, Item 7.

a. Explain why the budgets for advertising and program evaluation increase each year, Year 1 through Year 7.

1) Include in the explanation whether "new" participation is expected to be greater each year than the year before.

2) Explain whether advertising costs for a program should not, at some point, be expected to decrease following its initial roll-out.

b. Explain whether comparisons of program administrative costs have been made with similar programs for other utilities, either by the Companies or by an outside consultant.

31. Using calendar year 2010 usage as a basis, explain whether Kroger should expect an overall increase or decrease in its electric bills resulting from participation in the applicable proposed commercial DSM rate. The response should be specific for stores in the LG&E or KU service territories. Provide all calculations necessary to support your response.

32. Confirm that LG&E is a summer-peaking utility and KU alternates as a summer- or winter-peaking utility. Explain whether the fact that LG&E and KU are either summer- or winter-peaking utilities is a consideration when potential DSM programs are evaluated.

33. DSM programs are designed to postpone the need for new generation. Confirm that LG&E and KU generation is dispatched together, as a system. If confirmed, does the fact that LG&E and KU generation is dispatched as a system conflict with the Companies having separate DSM programs? Explain.

34. Using the following table format, provide, by program for LG&E electric, LG&E gas, and KU electric customers, the DSM Cost Recovery Component, DSM Revenues from Lost Sales, DSM Incentives, DSM Capital Cost Recovery Component, and DSM Balancing Adjustment in an Excel format with formulas intact and unprotected:

| Program | | DSM Cost Recovery Component (DCR) | DSM Revenues from Lost Sales (DRLS) | DSM Incentives (DSMI) | DSM Capital Cost Recovery Component (DCCR) | DSM Balancing Adjustment (DBA) | Total |
|---|---|---|---|---|---|---|---|
| Residential High Efficiency Lighting | | | | | | | |
| Residential New Construction | | | | | | | |
| Residential HVAC Tune Up | | | | | | | |
| Commercial HVAC Tune Up | | | | | | | |
| Customer Education & Public Information | | | | | | | |
| Dealer Referral Network | | | | | | | |
| Residential Responsive Pricing (RRP) | | | | | | | |
| Program Development & Administration | | | | | | | |
| Residential Conservation (HEPP) | | | | | | | |
| Residential Low Income Weatherization | | | | | | | |
| Residential Load Management | | | | | | | |
| Commercial Load Management | | | | | | | |
| Commercial Conservation/Rebates | | | | | | | |
| Smart Energy Profile | | | | | | | |
| Residential Refrigerator Removal | | | | | | | |
| Residential Incentives | | | | | | | |
| Total | | | | | | | |

DATED JUN 28 2011

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