

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

In the Matter of:

**JOINT APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY AND KENTUCKY UTILITIES) CASE NO.
COMPANY FOR REVIEW, MODIFICATION, AND) 2011-00134
CONTINUATION OF EXISTING, AND ADDITION OF NEW)
DEMAND-SIDE MANAGEMENT AND ENERGY-)
EFFICIENCY PROGRAMS)**

**RECEIVED
JUN 28 2011**

PUBLIC SERVICE
COMMISSION

**METROPOLITAN HOUSING COALITION'S SUPPLEMENTAL REQUESTS
TO LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY
UTILITIES COMPANY FOR INFORMATION**

Pursuant to the scheduling order adopted by the Commission in this case, Intervenor Metropolitan Housing Coalition (MHC) requests that Louisville Gas and Electric Company (LGE) and Kentucky Utilities Company (KU) file with the Commission the following information, with a copy to all parties of record, within the time specified in the Commission's Order. For each response to request for information,

- (1) Please identify the individual responsible for answering each request;
- (2) These requests shall be deemed continuing so as to require further and supplemental responses if LGE or KU receives or generates additional information within the scope of these requests between the time of the response and the time of the hearing;
- (3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian;

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information;

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

(6) If LGE and KU objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify MHC's Attorney of Record as soon as possible;

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

(8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state the identity of the person by whom it was destroyed or transferred; the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy; and

(9) Where the information requested is the same as has been provided to another party in response to a request for information, it is sufficient to identify that response rather than duplicating the information requested.

Supplemental Request For Information 1

In responses to Questions 1 and 2 of MHC's First Request for Information, LG&E/KU states "[t]he Companies do not track information by census tract." However, LG&E /KU produced several maps for review by MHC which pinpoint DSM services provided by location down to address (Exhibit 1) and a listing of services by address or zip code (Exhibit 3) for an MHC researcher who was able to create a map of energy efficiency program enrollment (Exhibit 2). It is apparent that LG&E/KU does have information regarding participation in DSM programs that is very specific.

- a. Please describe LG&E/KU's internal capacity to perform Geographic Information Systems (GIS) analysis of service provision, including DSM billing and DSM expenditures.
- b. Please describe LG&E/KU's external capacity or contracting for GIS analysis, including DSM billing and service provision.

Supplemental Request for Information 2

Please list all the ways that information on where all services (not just DSM services, but all services) provided can be retrieved or analyzed or compiled. Response should include, if available, ability to retrieve and sort data by date, address, ownership status of ratepayer (homeowner or renter), type of service, cost of service for each address or unit.

Supplemental Request for Information 3

Please list all the ways that information on where and amount of DSM fees billed can be retrieved, analyzed or compiled. Response should include ability to know the date, address, amount of fees.

Supplemental Request for Information 4

Please describe the data collected by LGE/KU for each DSM service provided, specifically address, customer type (e.g. homeowner, renter, business), activities performed and cost per service rendered.

Supplemental Request for Information 5

Referring to both DSM billing and DSM provision of service- at what geographic levels can this information be aggregated and analyzed: such as address, census block, census tract, political boundaries, zip codes, etc.?

Supplemental Request for Information 6

Please map where all services funded by DSM funds or funds specified for DSM from any source were provided , for calendar years 2009 and 2010, using color coding for type of service provided. Please include census tract boundaries in this map.

Supplemental Request for Information 7

Using information on where all services funded by DSM funds (or funds specified for DSM use from any source) occurred during calendar years 2009 and 2010, please create a map showing levels of DSM funds spent per service activity, using color coding by 6 categories of expenditure. Please include census tract boundaries in this map.

Supplemental Request for Information 8

What are the program-specific and aggregate DSM expenditures by census tract for calendar years 2009 and 2010? If this data is not available by census tract, please provide it by zip code. Please map this data grouping aggregate district DSM expenditures into 6 categories.

Supplemental Request for Information 9

Using information on all residential customers, please provide the median annual residential ratepayer DSM billing by census tract or zip code and including the number of ratepayers in those geographic areas for calendar years 2009 and 2010.

Supplemental Request for Information 10

In the response to the first MHC Request for Information, Question 3, LG&E/KU wrote “[p]articipant goals were not developed considering ownership status, but approximately 30% of LG&E’s customers reside in rental units.” Because there are no proposed participant goals for ratepayers who are renters, it is important to understand how renter participation in DSM programs has changed/increased/improved in since 2007.

Specifically, please provide the breakdown by homeowner versus renter for each category of residential DSM service provided for years 2007, 2008, 2009, and 2010.

If this data cannot be provided, please provide a detailed explanation of why this data is not tracked.

Supplemental Request for Information 11

Please provide a detailed explanation and list of costs for all analysis, tracking, programs or goals, activities and plans for ensuring that DSM services are provided without deliberate or inadvertent discrimination to persons in protected classes as defined by the Fair Housing Act.

Supplemental Request for Information 12

In many DSM programs advertising is the highest cost of the administrative budgets; in the three programs discussed in Data Request 1, Questions 7, 8, and 9, the cost of advertising for the projected 7 year period is \$5,897,000 out of a total administrative budget of \$11,066,000.

Please aggregate the proposed advertising cost of *all* DSM programs over the seven years and explain what activities this supports and cost estimates for each category of advertising activities.

Supplemental Request for Information 13

In response to initial Request for Information 3, Witness Michael Hornung stated that “approximately 30% of LGE’s customers reside in rental units.”

- a. Please provide the source of that percentage.
- b. Please describe whether and how the LGE database can identify, among the ratepayers who are billed for DSM programs, those who are participating in each program, and whether that person resides in a rental unit.

Supplemental Request for Information 14

Please provide the total number of residential customers participating in each DSM program for the years 2009 and 2010, and what percentage of those households participating are at or below 200% of the federal poverty guidelines.

Supplemental Request for Information 15

If the information requested in Supplemental Request 4 is not available, please explain the tracking or other mechanisms that LGE has used and any LGE intends to use going forward, that provides any assurance:

- a. That the marketing efforts for the DSM programs are effective in involving low-income households as participants, and

- b. That the allocation of program costs for each program among the various classes of residential customers (i.e. single family owner occupied, multi-family owner occupied, condominium, and rental units) and among various income brackets (low-income, moderate income, high income) are fair.

Respectfully submitted,



Tom Fitzgerald
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602
(502) 875-2428
FitzKRC@aol.com

Counsel for Movant for Intervention
Metropolitan Housing Coalition

CERTIFICATE OF SERVICE

I certify that an original and ten (10) copies of this Motion of the Metropolitan Housing Coalition for Full Intervention were filed by priority mail to the Docket Clerk, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 and that a true and accurate copy of the foregoing was mailed via first class U.S. Mail, postage prepaid, this 28th day of June, 2011, to the following:

Lexington-Fayette Urban County Government
Department Of Law
200 East Main Street
Lexington, KY 40507

Lonnie E Bellar
E.ON U.S. LLC
220 West Main Street
Louisville, KY 40202

Kendrick R Riggs, Esq.
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KY 40202-2828

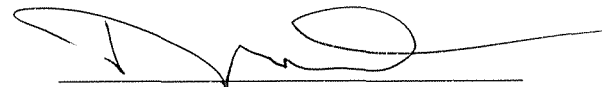
Iris G Skidmore, Esq.
415 W. Main Street, Suite 2
Frankfort, KY 40601

Allyson K. Sturgeon, Esq.
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202

Rick Lovekamp, Manager
Regulatory Affairs
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202

David Brown, Esq.
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Eileen L. Ordovery
Lisa Kilkelly
LEGAL AID SOCIETY, INC.
416 W. Muhammad Ali Blvd., Ste. 300
Louisville, Kentucky 40202



Tom FitzGerald

All Programs

- WeCare (Pink)
- AC Test&TuneUp (Green)
- Comm Audit (Blue)
- Res Audit (Brown)
- DLC (Yellow)



EXHIBIT I

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EE Program						
Zip	AC Test/ Tune Up	Commercial Audit	DLC	Residential Audit	WeCare	Grand Total
40003	2	2	27	4		35
40004		7	156	32	7	202
40005				1		1
40006	3	4	101	13	17	138
40007			7	2		9
40008		4	61	2	9	76
40009	1		8			9
40010		17	27	5		49
40011		5	86	1	10	102
40012		4	11	2		17
40013			1			1
40014	16	61	1527	170	55	1,829
40018			1			1
40019		5	162	5	14	186
40020			4			4
40022			34	4		38
40023	2	4	137	13	3	159
40024				1		1
40025		1	15	6		22
40026	3	8	417	70	6	504
40027		2	9	3	1	15
40031	27	67	1390	126	60	1,670
40033	3	37	226	8	41	315
40036			1		1	2
40037		1	40	1	12	54
40041				2		2
40045		1	18	1	7	27
40046			9			9
40047		15	112	37	25	189
40050	1	4	56	4	4	69
40051		3	14	4	13	34
40052			5		1	6
40053				1		1
40055		1	8			9
40056	6	7	255	49	18	335
40057	2	1	73	2	2	80
40059	21	38	1642	370	17	2,088
40060		1				1
40061		2		1		3
40065	24	139	1684	54	63	1,964
40066		2				2
40067	2	17	193	13	1	226
40068		1	36	2	1	40

40069	5	13	78	6	8	110
40070			3		2	5
40071		24	208	10	11	253
40075		1	16	2	1	20
40076		3	24	1		28
40077		1	32	1	2	36
40100		1				1
40106				3	1	4
40107			21	4	4	29
40108	3	17	88	6	18	132
40109		3	4			7
40113					1	1
40115				1		1
40118	5	9	792	23	167	996
40129		2				2
40150		3	51		5	59
40155		2	48	1	7	58
40156		1				1
40158					1	1
40159		1				1
40160	6	122	446	38	79	691
40162	1	1	73	4	1	80
40165		64	441	58	50	613
40175	3	9	190	20	2	224
40177			17	1	22	40
40183		1				1
40201		7				7
40202		186	298	10	1	495
40203	11	158	703	121	303	1,296
40204	13	173	1263	243	110	1,802
40205	40	130	2722	524	22	3,438
40206	34	159	2086	333	55	2,667
40207	61	294	5079	759	31	6,224
40208	6	73	710	64	153	1,006
40209		48	9	5	9	71
40210	5	39	557	107	676	1,384
40211	17	49	950	232	927	2,175
40212	10	35	623	116	612	1,396
40213	17	222	1838	126	123	2,326
40214	33	113	3659	257	219	4,281
40215	15	31	1136	75	316	1,573
40216	36	154	3139	232	652	4,213
40217	23	38	1334	144	99	1,638
40218	23	259	2494	244	301	3,321
40219	29	153	3271	207	320	3,980
40220	37	155	4213	508	74	4,987
40222	37	240	4034	455	25	4,791

40223	29	246	2236	428	36	2,975
40224		1		1		2
40225				2		2
40226				6		6
40228	15	52	1136	171	61	1,435
40229	15	48	2348	132	230	2,773
40232		3	1	3	1	8
40234				1		1
40235				1		1
40236				2		2
40238		4		1		5
40240				1		1
40241	34	139	2882	452	56	3,563
40242	16	16	1274	218	24	1,548
40243	20	146	1252	157	26	1,601
40244				1		1
40245	19	69	2666	452	33	3,239
40246				1	1	2
40250		1				1
40251		1				1
40253		2				2
40255		1			1	2
40256		13				13
40257				1		1
40258	13	136	1927	120	372	2,568
40259		3				3
40260				1	2	3
40261		2				2
40264		1				1
40265					1	1
40268		2				2
40269		3				3
40270		1		1	1	3
40271				2	1	3
40272	23	64	2210	158	523	2,978
40276					1	1
40287		3				3
40291	44	42	3597	360	150	4,193
40292		1				1
40297		1				1
40299	45	463	3822	543	99	4,972
40301					1	1
40305				1		1
40306		1				1
40307				1		1
40310		2	32			34
40311	1	9	190	11	34	245

40313	1	1	64	20	26	112
40319			2		2	4
40320				1		1
40321				1		1
40324	64	75	2236	214	50	2,639
40328				1		1
40330	23	44	802	74	69	1,012
40333				1		1
40336		9	109	4	19	141
40337			37	10	3	50
40342	20	29	904	71	34	1,058
40345				1		1
40347	8	10	195	24	1	238
40348		7	75		6	88
40350	1		3			4
40351	6	30	307	206	74	623
40353	25	60	600	49	78	812
40355				1		1
40356	8	31	319	23	3	384
40357		2	2	1	2	7
40359		9	15	6	1	31
40360		4	67	12	5	88
40361	16	16	516	13	44	605
40362				1	3	4
40363			4	3	1	8
40365				1	1	2
40366				1		1
40370		2	17	5	1	25
40371		2	29	2	12	45
40372	1		31	4		36
40374			15		6	21
40377				2		2
40379	1	2	117	5		125
40381					1	1
40383	31	65	1604	146	16	1,862
40385		1	27	5		33
40390	4	4	465	30	3	506
40391	32	111	1644	100	74	1,961
40392		5				5
40403			5			5
40409	1	1	51			53
40411		1				1
40419		1	53		2	56
40420				5		5
40422	27	84	1572	121	30	1,834
40423		7				7
40425				1		1

40437		4	44	1		49
40440	2		54	3	4	63
40442		1	1			2
40444	3	13	318	14	20	368
40445			21			21
40456	2	9	177	3	10	201
40458					2	2
40461			7	1		8
40464			3			3
40468	1		70			71
40472			2	1	1	4
40473					1	1
40475	44	92	2840	177	123	3,276
40476		4		1		5
40478				1		1
40484	3	12	125	5	9	154
40489		1	12			13
40495		1				1
40501		1				1
40502	59	57	2619	409	16	3,160
40503	83	132	3685	370	25	4,295
40504	22	50	2108	170	51	2,401
40505	31	120	1714	110	140	2,115
40506		1		8	2	11
40507	1	55	46	7		109
40508	8	79	910	72	207	1,276
40509	68	204	2721	300	42	3,335
40510		19	86	19		124
40511	48	170	2045	178	207	2,648
40512		1				1
40513	21	32	943	97		1,093
40514	17	5	1134	115	7	1,278
40515	36	17	2615	257	35	2,960
40516	5	5	198	16	6	230
40517	30	46	3323	159	76	3,634
40519				3		3
40522		4				4
40523				1		1
40528					2	2
40531				1		1
40533		1				1
40545				1		1
40555		1			1	2
40558		1				1
40576		2				2
40578		1				1
40581					1	1

40583		1				1
40588		4				4
40591		2				2
40599				1		1
40601	5	11	317	38	21	392
40603				1		1
40604				1		1
40608					1	1
40622		1				1
40633				1		1
40653					1	1
40660		1				1
40701	3	17	353	11	44	428
40702		3				3
40704					1	1
40709				1		1
40729	1	1	5		7	14
40734			6	1	1	8
40740	1		18	2	17	38
40741	5	90	424	7	49	575
40743		6				6
40744		8	259	4	17	288
40769	4	9	305	8	11	337
40771			6			6
40806				1	6	7
40813				1	3	4
40815				1	15	16
40819					5	5
40820					2	2
40823		2	2		6	10
40826					1	1
40828		1		1	20	22
40829					1	1
40831		12	1	12	27	52
40845					3	3
40846					1	1
40851		1				1
40854			1	1	7	9
40855				2		2
40873		1		1	11	13
40902		1			13	14
40906				2		2
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40921		1				1
40927			1			1
40931				1		1

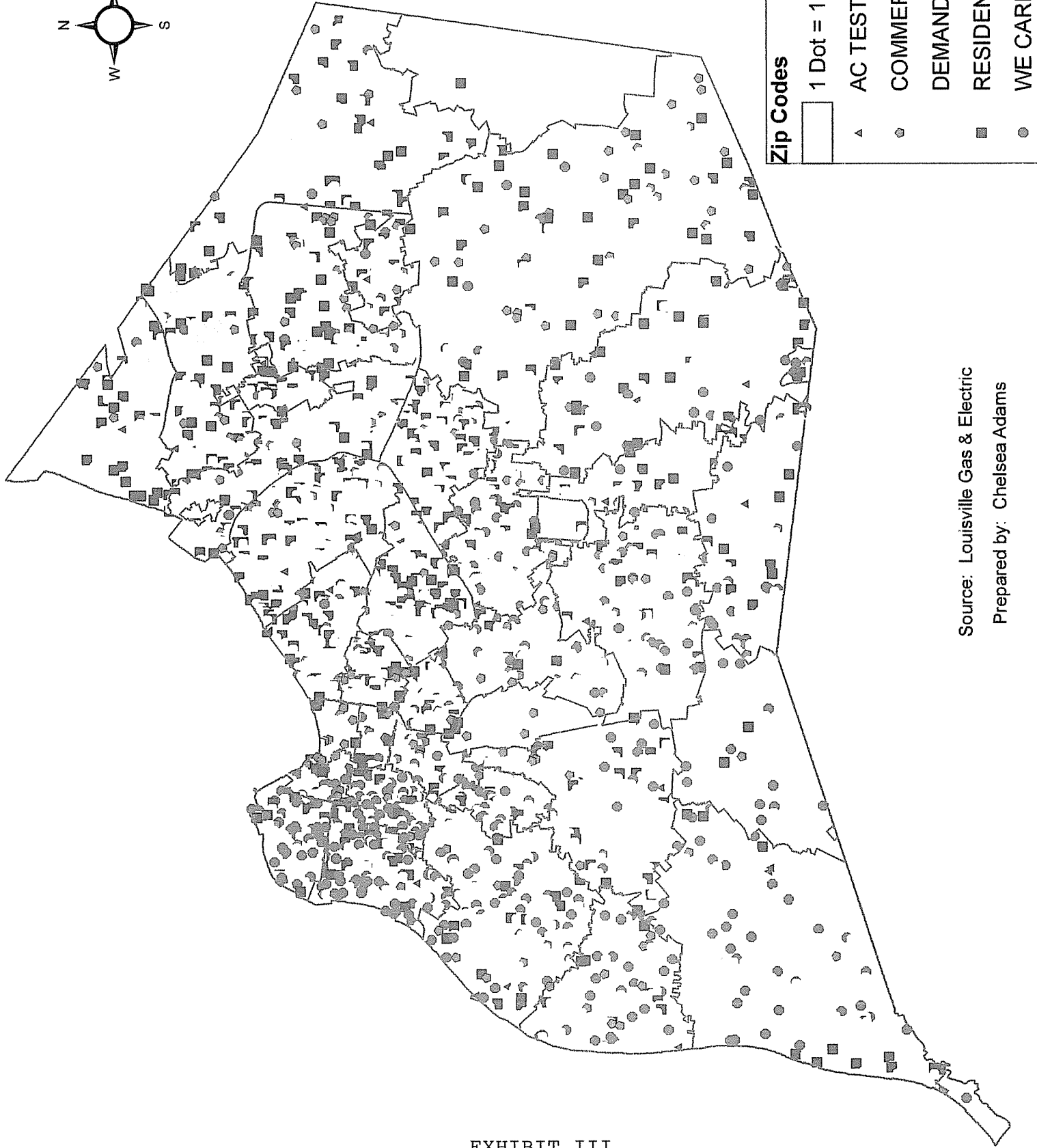
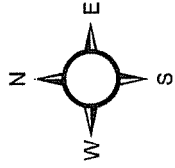
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40939		1				1
40961				1		1
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40964			1		1	2
40965	1	28	6	16	63	114
40977	1	11	32	10	27	81
40982					1	1
40985				1		1
40988					2	2
40997			1			1
41002		3	3		13	19
41003		1			8	9
41004		5	1	6	2	14
41005				1		1
41006		2	1			3
41007		1	1	1		3
41008	1	32	217	33	11	294
41010		1	6			7
41011		1				1
41031	7	29	310	25	74	445
41033				2		2
41034		1	2	2		5
41039			14		2	16
41040			2			2
41041		9	190	55	9	263
41044				1		1
41045			6			6
41048		1				1
41050				1		1
41052				1		1
41055		1				1
41056		27	98	12	21	158
41058				1	1	2
41064		1	1			2
41065				1	1	2
41086		1	1		1	3
41095		4	3	1	2	10
41098			23	2	11	36
41101		2				2
41105		1				1
41214				1		1
41223				1		1
41301		1				1
41311		4			1	5
41501		1				1
41653		2				2

41719		1				1
42001			3			3
42004		1				1
42022			3			3
42024		15	29	18	16	78
42030				1		1
42031		19		2	4	25
42032		1		1		2
42035					1	1
42038		56	118	9		183
42040				1		1
42045					1	1
42053		9	46	19	6	80
42055		4	31	1		36
42056		17	38	3	10	68
42058					1	1
42064		28	10	9		47
42078		4	3			7
42086			50	2		52
42087		18		13	12	43
42127	2	15	63	5	7	92
42135		1				1
42141				2		2
42156		1				1
42217		9	3	1		13
42230				1		1
42301		3				3
42303		1				1
42308		1				1
42315					1	1
42320		21	140	69	36	266
42321		1				1
42323		1	1			2
42325			1	2	20	23
42326					1	1
42327		17		1	1	19
42328		2	21	3	1	27
42330		78	9	9	76	172
42332					3	3
42337			3	4	21	28
42343		1				1
42344			2		12	14
42345		46	15	12	30	103
42346					1	1
42347		35	82	6	9	132
42350		5	2	1		8
42352		5	1		6	12

42354		1	3	1		5
42367		6	1	1	4	12
42369		1	4			5
42371				1		1
42372		5	1		3	9
42374		2			1	3
42404		4		1		5
42406			9	2		11
42408		24	73	26	15	138
42409		5		1		6
42410		6	49		10	65
42411		2	25	2		29
42413		1	26	2		29
42419		1				1
42420		17	94	13		124
42431		10	372	11	42	435
42436			5			5
42437		48	2	5		55
42440		2	3		4	9
42441			6	1		7
42442		7	16		7	30
42444				1		1
42445			24	2		26
42452			6	1		7
42453		1	6		1	8
42455		3	1			4
42456		1	2	1		4
42457			3	1		4
42459		11	1	4		16
42461		4				4
42464			11		6	17
42467				1		1
42470				1		1
42478		1				1
42501	3	106	392	39	5	545
42502		12				12
42503	7	46	332	27	2	414
42507		2				2
42519			23	1		24
42530				1		1
42533			34	2		36
42539	1	8	10	1		20
42541			1			1
42553	1	2	54	3	2	62
42558			2			2
42564		4				4
42566			1			1

42567		2	11	1		14
42629	2	4	141	4		151
42631		1				1
42638			1			1
42642		13	88	2	1	104
42647			1	1		2
42653		4	1			5
42701	14	214	1487	91	58	1,864
42702		8				8
42707				1		1
42712			9	1	6	16
42713		4	5	1		10
42715		1				1
42716			26	1	1	28
42718	9	23	464	7	12	515
42719		1				1
42721		5	14	1	3	23
42722			3			3
42724		2	105	5	3	115
42726		15	25		1	41
42728		21	97	7	16	141
42732		1	17	1	1	20
42740			23	3		26
42743	1	18	75	1		95
42746			6	2		8
42748	3	18	147	8	20	196
42749	6	24	82	2	19	133
42751				1		1
42754	5	88	114	12	39	258
42755		2				2
42757			8	1	1	10
42762			6			6
42763		1				1
42765	5	40	44	3	8	100
42766		2				2
42776		7	30	6		43
42784		5	9		3	17
42788			8			8
Grand Total	1,699	8,318	124,610	13,634	10,143	158,404

LG&E Energy Efficiency Enrollment, November 2001-November 2010



Zip Codes

- 1 Dot = 15
- ▲ AC TEST AND TUNE UP
- ◆ COMMERCIAL AUDIT
- DEMAND LOAD CONTROL
- RESIDENTIAL AUDIT
- WE CARE

Source: Louisville Gas & Electric
Prepared by: Chelsea Adams