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May 24, 2012

RECEIVED

VIA FEDEX

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sauer Boulevard

MAY 25 2012 PUBLIC SERVICE COMMISSION

RE: Case No. 2012-00143

Dear Mr. Derouen:

Frankfort, KY 40601

Enclosed for filing are the original and 10 copies of Response of Kenergy Corp. to First Data Request of Commission Staff in above case. .

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By

J. Christopher Hopgood Attorney for Kenergy Corp.

JCH/cds Encls.

COPY/w/encls.:

Mr. Sandy Novick, Kenergy

COMMONWEALTAH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION ECEIVED

MAY 25 2012

In the matter of:

PUBLIC SERVICE COMMISSION

TARIFF FILING OF KENERGY CORP. TO IMPLEMENT DEMAND-SIDE MANAGEMENT PROGRAMS

Case No. 2012-00143

RESPONSE OF KENERGY CORP. TO FIRST DATA REQUEST

OF COMMISSION STAFF

Following are Kenergy Corp.'s responses to May 4, 2012, Commission Staff's First Request for Information.

DORSEY, KING, GRAY, NORMENT & HOPGOOD

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Henderson, Kentucky 42420

Telephone 270 - 826-3965

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counsel for Kenergy Corp.

 $\mathbf{B}\mathbf{y}$

J. Christopher Hopgood

VERIFICATION

The undersigned David Hamilton hereby verifies that the information set forth in the following Responses of Kenergy Corp. to First Data Request of Commission Staff is true and correct to the best of my information, knowledge and belief.

David Hamilton Kenergy Corp.

STATE OF KENTUCKY

COUNTY OF HENDERSON

The foregoing was signed, acknowledged and sworn to before me by
DAVID HAMILTON membershirishliristor of KENERGY CORP., this 24/ day
of <u>may</u> , 2012.
My commission expires <u>September 29, 2013</u>

Notary Public, State of Kentucky at Large

(seal)

1 2 3	KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION		
4 5 6 7	CASE NO. 2012-00143		
8	Item 1) Refer to the proposed tariffs filed on Aril 9, 2012.		
9	a. Refer to proposed Original Sheet Nos. 49 and 50, the Energy Star		
10	Refrigerator Replacement Incentive Program and the Residential High Efficiency		
11	Heating, Ventilation and Air Conditioning ("HVAC") Program tariffs, respectively. In		
12	the "Customer Incentives" sections of both tariffs, it states that Kenergy Corp. will pay or		
13	reimburse "one of its residential customers" an incentive. Explain the use of the phrase		
14	"one of its residential customers" and state whether it is Kenergy's intention to limit the		
15	incentive to one per household.		
16	RESPONSE:		
17	a. Kenergy Corp. does not intend to limit the incentives in Sheet Nos. 49 and		
18	50 to one per household. Each of the incentives is intended to be paid t		
19	residential customers and not commercial customers; hence, the phrase "one		
20	of its residential customers."		
21			
22	b. Refer to proposed Original Sheet No. 51, the Touchstone Energy New		
23	Hoe Program tariff The "Purpose" section references "one of three specified types of		

Energy Star rated HVAC systems" that could be installed under this program. However 1 four types are listed in the "Customer Incentives" part of the tariff. Did Kenergy intend 2 for the "Purpose" section to refer to "one of four specified types of Energy Star rated 3 HVAC systems"? If no, explain. 4 5 **RESPONSE:** 6 Yes. Sheet No. 51 should read "one of four types of Energy Star rated HVAC 7 systems." 8 Refer to proposed Original Sheets Nos. 53 and 53A, the 9 c. Commercial/Industrial High Efficiency Lighting Replacement Incentive Program tariff. 10 11 The term "Rural Customers" is used throughout this tariff. Did Kenergy intend to refer to 12 "Commercial and Industrial customers" rather than to Rural Customers"? If no, explain. 13 **RESPONSE:** Sheet No. 53 and 53A should read "Commercial and Industrial 14 Yes. 15 Customers." 16

WITNESS: David Hamilton

17

1 KENERGY CORP. 2 RESPONSE TO COMMISSION STAFF'S 3 FIRST REQUEST FOR INFORMATION 4 5 CASE NO. 2012-00143 6 7

Refer to the proposed tariffs filed on April 24, 2012, proposed Original Sheet No. 55, the Residential Weatherization Program-Primary Heating Source Non-Electric and Electric-Sourced Air Conditioning. The "Member Incentives" section states that "Kenergy Corp. will provide 25% of the cost of approved residential weatherization improvements performed in accordance with this program." In the Residential Weatherization Program tariff filed by Big Rivers Electric Corporation, Kenergy's wholesale supplier, it states that "Big Rivers will provide 50% of the cost of residential weatherization improvements performed in accordance with this program." Did Kenergy intend to use "50%" rather than "25%" in this section? If no, explain the reason for the difference in the percentage of weather normalization costs that will be covered by Kenergy and Big Rivers.

RESPONSE:

No. Kenergy Corp. intends to provide a weatherization incentive of 50% to homes with electric heat and electric air conditioning (Sheet Nos. 56, 56A) and a 25% incentive to homes with non-electric heat and electric air conditioning (Sheet Nos. 55, 55A). The Kenergy Corp. incentives mirror Big

Rivers Electric Corporation (BREC) weatherization incentives described in their DSM-05 and DSM-10 tariffs.

3

4 WITNESS: David Hamilton

1 2 3		KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION	
4 5 6 7		CASE NO. 2012-00143	
8	Item 3	Provide Kenergy's plan for promoting the programs included in the	
9	proposed tariffs.		
10	RESPONSE:		
11	Kenergy Corp. intends to promote the DSM programs through its monthly		
12	newsletter, its website, social media, regional radio stations, and regiona		
13	newspapers. Promotion also will be made through direct mail, regional home		
14	builder associations, home expos, Chamber of Commerce meetings, civic clul		
15	meetings, Kenergy Annual Meeting, Kenergy Member Resource Committee		
16	meetings.		
17			
18	WITNESS: Da	vid Hamilton	