

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)	2014-00003
CONTINUATION OF EXISTING, AND ADDITION)	
OF NEW, DEMAND-SIDE MANAGEMENT AND)	
ENERGY-EFFICIENCY PROGRAMS)	

**SUPPLEMENTAL REQUESTS FOR INFORMATION OF ASSOCIATION OF
COMMUNITY MINISTRIES, INC.**

In accordance with the procedural schedule established by the Commission by Orders dated January 30 and March 17, 2014, Association of Community Ministries, Inc. (“ACM”), by counsel, requests the response of the Joint Applicants to the following Supplemental Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) 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.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) 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 of and legal basis for the privilege asserted.

(6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please refer to the Companies' response to Request No. 3 of ACM's Tendered First Requests for Information.
 - (a) Please describe the calculation used to arrive at the annual bill impact by zip code and include a representative example from one of the figures on the table provided.
 - (b) Please confirm that the amounts provided in the table include the average annual DSM/EE bill impact for both residential gas and electric service. If not, please identify the amounts provided and provide the requested information for both gas and electric.
2. Please refer to the Companies' response to Requests No. 6(e) and 6(f) of ACM's Tendered First Requests for Information, regarding the incentive payments made under the Residential Conservation/Home Energy Performance Program. Please explain in detail why the figures for zip code 40215 are so high relative to all other zip codes included in the response.
3. Please refer to the Companies' responses to Request No. 6(h) of ACM's Tendered First Requests for Information, where it is stated that "[i]ncentive payments made through the Residential Conservation/Home Energy Performance Program are not tracked by status as a renter," and Request No. 24, where it is stated that "LG&E requires a signed landlord consent form for the...Home Energy Analysis and Residential HVAC programs."

(a) Does LG&E require a signed landlord consent form for the on-site energy audit component of the Residential Conservation/Home Energy Performance Program, or for any other component of that program?

(b) If “yes,” how many signed landlord consent forms did LG&E obtain for each of the years 2012 and 2013?

(c) In regard to incentive payments, does LG&E have the ability to track indicia of renter status, such as location within a multi-family building or complex, receipt of a landlord consent form, or any other indicator?

4. Please refer to the Companies’ response to Request No. 7(a) of ACM’s Tendered First Requests for Information. Do the figures provided represent newly-installed load control switches for each respective year?

5. Please refer to the Companies’ response to Requests No. 7(c), (d) and (e) of ACM’s Tendered First Requests for Information. Do the figures provided reflect bill credits only, or bill credits plus sign-up incentives? If the former, please provide figures for sign-up incentives for each of requests 7(c), (d) and (e). If the latter, please disaggregate the figures for each of requests 7(c), (d) and (e).

6. Please refer to the Companies’ responses to Request No. 7(e) of ACM’s Tendered First Requests for Information, where it is stated that data on the number of customers who were renters and received incentives under the Residential Load Management/Demand Conservation Program is “not readily available, and possibly indeterminable,” and Request No. 24, where it is stated that “LG&E requires a signed landlord consent form for the Demand Conservation program...”

(a) How many signed landlord consent forms did LG&E obtain for each of the years 2011, 2012 and 2013?

(b) Please explain why the number of renters receiving incentives under the Residential Load Management/Demand Conservation Program is “possibly indeterminable.”

(c) Does LG&E have the ability to track indicia of renter status, such as location within a multi-family building or complex, receipt of a landlord consent form, or any other indicator?

7. Please refer to the Companies’ response to Request No. 8 of ACM’s Tendered First Requests for Information, regarding sign-up incentives offered during parts of 2012 and 2013 under the Residential Load Management/Demand Conservation Program.

(a) Please provide a breakdown, by zip code, showing how many LG&E customers received an enrollment bonus in each of the years 2012 and 2013.

(b) Please provide a breakdown, by zip code, showing how many LG&E customers who received an enrollment bonus in each of the years 2012 and 2013 were renters.

(c) Please provide the total number of Jefferson County customers who received an enrollment bonus in each of the years 2012 and 2013 and who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013.

(d) Please describe how and to which customers the sign-up incentives were marketed.

8. Please refer to the Companies' response to Request No. 8 of ACM's Tendered First Requests for Information, where it is stated that "[c]ustomers living in multi-family residences split a \$4 monthly incentive with the landlord for each central air conditioner or heat pump with a load control switch installed." Refer as well to Exhibit RMC-2 to the Direct Testimony of Robert M. Conroy, Tariff Sheet 86.8 (P.S.C. Electric No. 9, Fourth Revision of Original Sheet No. 86.8), and the first two bullet points under the heading "Multi-family Option."

(a) Please reconcile the response to Request No. 8 with the tariff so as to provide a clear and comprehensive explanation of how the bill credit incentive is applied in multi-family housing. Please address both those cases in which all units in an apartment complex participate as well as those in which less than all participate.

(b) Please refer to the third bullet point under "Multi-family Option" on the above-referenced tariff sheet, where bonus incentives are discussed. Does the statement "[c]ustomers in a tenant/property owner relationship where the entire complex participates, the property owner will receive a \$25 bonus incentive per air conditioning unit, heat pump, or water heater" mean that the property owner will receive the incentive bonuses, even if the tenants are the customers? If so, please explain the rationale. If not, please explain how LG&E interprets this provision of the tariff, and how it is applied in practice.

9. Please provide the incentive amount per refrigerator under the Refrigerator Removal Program since its inception.

10. Please refer to the list of WeCare measures provided in response to Request No. 15 of ACM's Tendered First Requests for Information. Does "lighting retrofit/replace" refer

only to the provision of CFL bulbs, or does it include other measures as well? If other measures are included, please identify them.

11. Please refer to the Companies' response to Request No. 16 of ACM's Tendered First Requests for Information. Please explain why the average cost of weatherization services provided to Tier C WeCare Customers in Jefferson County dropped from \$1,669 in 2012 to \$1,352 in 2013.

12. Please refer to the Companies' response to Request No. 18 of ACM's Tendered First Requests for Information. Does LG&E use the referenced collaborations, or similar ones, to reach out to low-income customers who might participate in DSM/EE programs other than WeCare?

13. Please refer to the Companies' response to Request No. 18 of ACM's Tendered First Requests for Information, and to Exhibit MEH-2, *Louisville Electric and Gas/Kentucky Utility Company DSM Program Review*, at page 74, where "program targets" and "program goals" for the WeCare program are referenced.

(a) Please provide said program targets and program goals for the LG&E service territory for each of the years 2011, 2012 and 2013.

(b) For each year, please indicate whether or not each target and goal set for the LG&E territory, respectively, was met. For each target or goal that was not met, please indicate and explain the extent to which performance fell short.

(c) How does LG&E monitor progress being made towards meeting WeCare program targets and goals? Please provide copies of any reports, memoranda, reviews, evaluations or other documents produced in connection with such monitoring since the Commission's final order in Case No. 2011-00134.

14. Please refer to the Companies' response to Request No. 20 of ACM's Tendered First Requests for Information. Please describe how the Companies plan to involve additional community action groups as program service providers in the WeCare program, including the specific services LG&E envisions these groups providing and the timeline for this expansion.

15. Please refer to the Companies' response to Request No. 21 of ACM's Tendered First Requests for Information.

(a) What other utilities' programming has LG&E monitored and/or investigated?

(b) For each utility program identified in (a), please describe the utility and the methods of marketing used, and the sources LG&E utilized for obtaining this information.

16. Please refer to the Companies' response to Request No. 22 of ACM's Tendered First Requests for Information. Please describe the "rebate structure" LG&E has developed, including how it operates; how it serves "to complement many of the CAGs' processes"; and the names and locations of the participating CAGs.

17. Please refer to the Companies' response to Request No. 24 of ACM's Tendered First Requests for Information.

(a) Please explain the process for obtaining a signed landlord consent form.

(b) How does LG&E determine which customers need a landlord consent form?

(c) For the Fridge and Freezer and Home Energy Rebates programs, does LG&E make a special inquiry to determine that a renter owns the appliances, or does every participant need to show proof of ownership?

18. Please refer to the Companies' response to Request No. 11 of ACM's Tendered First Requests for Information. Please also refer to the Direct Testimony of Michael E.

Hornung, Appendix D, Page 4 of 7 and see the first Q and A which states:

“Q: Will special research be conducted on how monies are charged where multi-family programming is concerned?
A: Multi-family dwellings are accounted for in program participation rates.”

(a) Please provide any information the Companies have with respect to the participation rates of customers living in multi-family dwellings for each residential DSM program approved through the end of 2014 and/or the end of 2018, as listed in the Direct Testimony of Michael E. Hornung at Page 4, Lines 7 through 21.

(b) Please explain how the Companies use information they have about multi-family dwellings and DSM/EE program participation rates and reconcile the answer with the response to Request No. 11.

19. Please refer to the Companies' response to Request No. 11 of ACM's Tendered First Requests for Information. Please also refer to the Direct Testimony of Michael E. Hornung, Appendix D, Page 4 of 7 and see the second Q and A, which states:

“Q: Has the Smart Energy Profile allowed the Company to go to a new level of granularity of customer data? A: The data that the Company has is usage for load forecasting. The Company has contracted with a 3rd party vendor for demographic data. The Company does not own the PVA data, it is proprietary information.”


(a) Please identify the 3rd party vendor referenced and describe the status of the referenced contract, such as completed or ongoing and whether additional contracts have been entered.

- (b) Please describe the demographic data that was obtained through the referenced contract and provide copies of any reports or results.
- (c) Please provide the results of any other studies or inquiries the Companies have conducted, either internally or through third party vendors, pertaining to demographic data in connection with DSM/EE programming.
- (d) Please describe any current efforts to obtain demographic data data in connection with DSM/EE programming, including whether such efforts are conducted by the Companies or third party vendors, the purposes of such efforts, and the expected date(s) of any interim or final results.
- (e) Please explain how the Companies use demographic data they obtain in connection with DSM/EE programming and reconcile the answer with the response to Request No. 11.

20. Please refer to the Companies' response to Request No. 25(a) of ACM's Tendered First Requests for Information. How did the Companies determine which zip codes to include in the survey?

21. Please provide the supporting calculations for the Companies' response to Request No. 27 of ACM's Tendered First Requests for Information.

Respectfully submitted,



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Dated: March 18, 2014

CERTIFICATE OF COMPLIANCE AND SERVICE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s March 18, 2014 electronic filing of the foregoing Supplemental Requests For Information of Association of Community Ministries, Inc. is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 18, 2014; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium are being mailed to the Commission on March 18, 2014.



Eileen Ordovery