

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)	

**TENDERED FIRST REQUESTS FOR INFORMATION OF ASSOCIATION OF
COMMUNITY MINISTRIES, INC.**

In accordance with the procedural schedule established by the Commission by Order dated January 30, 2014, Association of Community Ministries, Inc. (“ACM”), which moved for intervention on January 28, 2014, by counsel hereby tenders its First Requests for Information and, if intervention is granted, requests the response of the Joint Applicants to the following.

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 provide the total dollar amounts billed in DSM/EE charges to LG&E customers, broken down by zip code, for each of the calendar years 2011, 2012 and 2013.
2. For each of the calendar years 2011, 2012 and 2013, please provide the total dollar amounts billed in DSM/EE charges to LG&E customers who had at least one bill paid by a third-party assistance provider during the period 2011 through 2013.
3. Please provide the average annual DSM/EE bill impact on residential LG&E customers for each of the calendar years 2011, 2012 and 2013, broken down by zip code.
4. Please provide the total number of CFL bulbs distributed to Jefferson County customers under the Residential High Efficiency Lighting Program, broken down by zip code, in each of 2011, 2012 and 2013.
5. Please provide the following information concerning the Residential HVAC Diagnostic/Tune-up Program:
 - (a) A breakdown, by zip code, showing how many residential diagnostic performance checks were performed in Jefferson County in each of calendar years 2011, 2012 and 2013;
 - (b) The number of residential customers in Jefferson County receiving diagnostic performance checks in each of calendar years 2011, 2012 and 2013 who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013;

(c) A breakdown, by zip code, of how many residential customers in Jefferson County took corrective action under the program following a performance check in each of the calendar years 2011, 2012 and 2013; and

(d) The total number of Jefferson County customers who took such corrective action and who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013.

6. Please provide the following information regarding the Residential Conservation/Home Energy Performance Program:

(a) A breakdown, by zip code, showing how many on-line energy audits were completed by LG&E customers in Jefferson County in each of calendar years 2011, 2012 and 2013;

(b) The total number of LG&E customers in Jefferson County who completed an on-line energy audit in each of calendar years 2011, 2012 and 2013 and had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013;

(c) A breakdown, by zip code, showing how many LG&E customers in Jefferson County had on-site energy audits in each of calendar years 2011, 2012 and 2013;

(d) The total number of Jefferson County customers receiving an on-site energy audit in each of the calendar years 2011, 2012 and 2013 who also had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013;

- (e) The number of Jefferson County customers who received financial incentives for achieving the required degree of energy savings, broken down by zip code, for each of the years 2011, 2012 and 2013;
- (f) Total incentive payments made to Jefferson County customers in each of the years 2011, 2012 and 2013, broken down by zip code;
- (g) For each of the years 2011, 2012 and 2013, the number of customers who received an incentive payment and who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013; and
- (h) For each of the years 2011, 2012 and 2013, the number of customers who received an incentive payment who were renters.

7. Please provide the following information concerning the Residential Load Management/Demand Conservation Program:

- (a) A breakdown, by zip code, showing how many load control switches were installed in Jefferson County in each of the years 2011, 2012 and 2013;
- (b) The total number of Jefferson County customers receiving load control switches in each of the years 2011, 2012 and 2013 who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013;
- (c) A breakdown by zip code of the dollar value of incentives awarded to Jefferson County customers under the program during each of the years 2011, 2012 and 2013;
- (d) For each of the years 2011, 2012 and 2013, the total value of the incentives that were paid to customers who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013; and

(e) Number of customers receiving incentives who were renters for each of the years 2011, 2012 and 2013.

8. Please describe each type of incentive offered under the Residential Load Management/Demand Conservation Program during each of the years 2011, 2012 and 2013, including the dollar value of each. Please include an explanation of the extent to which the type or value of incentives offered were modified during this period, and the reasons therefor.

9. Please provide the following information concerning the Refrigerator Removal Program:

(a) The total number of refrigerators removed in Jefferson County through the end of 2013, broken down by zip code;

(b) The number of customers who had refrigerators removed and who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013; and

(c) Total incentive payments made to Jefferson County customers under the Refrigerator Removal Program through 2013, broken down by zip code.

10. Please provide the following information concerning the Residential Incentive Program:

(a) The total number of Jefferson County customers who have received an incentive payment through 2013, broken down by zip code;

(b) The total dollar amount paid out in incentives to Jefferson County customers through 2013, broken down by zip code;

(c) The number of Jefferson County incentive payment recipients who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013; and

(d) The total dollar amount of incentive payments made to Jefferson County customers had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013.

11. Does LG&E review residential DSM/EE program participation by zip code, 3rd party assistance receipt, receipt of shut-off notice, owner- versus tenant-occupied, number of units in building or any other customer characteristic? If so, please fully describe such reviews including, but not limited to, the customer characteristics reviewed, process for reviewing them, frequency of review, and to what use the information so gleaned is put.

12. Please refer to the Direct Testimony of Mike Hornung at page 5, lines 9 – 12, where it is stated that the Companies “actively engage in a continuous improvement process for programming and practice evaluation, measurement, and verification” and that this “provides opportunities for continuous review and increasingly beneficial programming.” Please describe how this process continuously reviews and improves energy efficiency programming that takes advantage of savings potential from low-income customers and neighborhoods in Louisville.

13. Has LG&E studied, investigated or otherwise explored the energy efficiency potential of programming, other than WeCare, especially designed to engage and incentivize low-income utility consumers? If so, please describe these efforts and provide copies of any studies, reports, memoranda or other documents they reviewed, relied upon or produced.

14. Please provide the following information regarding WeCare participation in Jefferson County for each of calendar years 2011, 2012 and 2013:

(a) Number of customers served by the WeCare program, broken down by program tiers A, B and C;

(b) Number residing in multi-family housing, broken down by tiers A, B and C;
and

(c) Number residing in single-family homes, broken down by tiers A, B and C.

15. (a) Please provide a comprehensive list of the specific energy-saving measures (e.g., air and duct sealing and insulation; attic and wall insulation; HVAC tune-ups; appliance replacements, etc.) provided under the WeCare program in Jefferson County in each of calendar years 2011, 2012 and 2013.

(b) For each of calendar years 2011, 2012 and 2013, please indicate how many Jefferson County customers received each such WeCare measure, broken down by single- versus multi-family housing occupants.

(c) For each of calendar years 2011, 2012 and 2013, please indicate how many Jefferson County customers received each such WeCare measure, broken down by owners versus renters.

16. For each of calendar years 2011, 2012 and 2013, please provide the average cost of weatherization services provided to Tier A, B and C customers in Jefferson County, respectively.

17. Please provide the total WeCare program expenditures in LG&E service territory for each of 2011, 2012 and 2013, with labor and material costs broken out.

18. Please describe all methods LG&E currently uses to identify and engage customers who might benefit from the WeCare program.

19. Please provide the name of each entity with which LG&E contracted for implementation of any aspect of the WeCare program in LG&E's service territory during the years 2011, 2012 and 2013; a description of the respective services contracted for; and a copy of each contract.

20. Please refer to Exhibit MEH-2, *Louisville Electric and Gas/Kentucky Utility Company DSM Program Review*, at page 74, second paragraph, where it is stated in regard to WeCare that “[a]llowing other CAGs to participate as additional program service providers in the future, *as the Company already has plans to do*, will not only broaden the program's reach...but can also help the Company increase its participation rates as the program grows.” (Emphasis added.) Please describe these plans in detail as they relate to the LG&E service territory.

21. Please refer to Exhibit MEH-2, *Louisville Electric and Gas/Kentucky Utility Company DSM Program Review*, at page 74, fourth paragraph, where it is stated in regard to WeCare that “[a]dditionally, some utilities leverage internal customer data to identify and reach out directly to customers who may face challenges meeting their monthly costs – for example, targeting those who have received shut-off notices – to increase participation in a controlled manner.” Does LG&E have any plans to use internal customer data to identify and reach out directly to potential WeCare participants?

22. Please refer to Exhibit MEH-2, *Louisville Electric and Gas/Kentucky Utility Company DSM Program Review*, at page 74, “Outcomes,” where it is stated that Cadmus determined that recruiting “new CAGs to support program implementation as needed to meet participation targets and funding obligations” would enhance the WeCare program. Does LG&E intend to adopt this recommendation in its service territory?

23. Please confirm the accuracy of the following statements regarding the WeCare program as it operates in the LG&E service territory. If any statement is inaccurate, please make and explain any necessary corrections.

(a) In order to be eligible, a customer must have a current 12-month service history with LG&E.

(b) Renters in multi-family buildings of more than 8 units are not eligible for any WeCare services.

(c) In a building of 8 units or less, LG&E will weatherize the entire building if at least 50% of the residents are LIHEAP eligible and have their utility bill in their own name.

24. Please explain how LG&E customers who are renters may participate in each of the residential DSM/EE programs included in the 2015-2018 Demand-Side Management and Energy Efficiency Program Plan set forth in Exhibit MEH-1. Please include existing, unchanged programs as well as new and enhanced programs.

25. (a) Please provide a breakdown by zip code of the number of customers solicited to complete the on-line survey conducted as part of the Residential Smart Meter Study attached as Exhibit DEH-3 to the Direct Testimony of David E. Huff.

(b) Please provide a breakdown by zip code of the number of customers who completed the survey.

(c) In determining which customers would be solicited, how did the Companies ensure that a representative number of low-income customers would be included in the sample?

26. Please refer to pages 14-15 of the Direct Testimony of Michael Hornung, where residential bill impacts are discussed based on certain monthly levels of energy usage. Assuming

the same monthly energy usage, please provide a breakdown of the monthly bill impact on LG&E customers of each DSM/EE program included in the 2015-2018 Demand-Side Management and Energy Efficiency Program Plan set forth in Exhibit MEH-1. Please include existing, unchanged programs as well as new and enhanced programs.

27. For each of the years 2011, 2012 and 2013, please provide the average monthly electric usage and average monthly gas usage of LG&E customers for whom at least one bill was paid by a third-party assistance provider during the period 2011 through 2013.

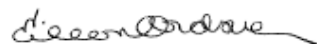
28. Please provide the following figures:

(a) Total number of LG&E residential customers for each of the years 2011, 2012 and 2013;

(b) Total number of LG&E residential customers in Jefferson County for each of the years 2011, 2012 and 2013, broken down by zip code; and

(c) Total number of residential customers in Jefferson County who had at least one bill paid by a third-party assistance provider during each of calendar years 2011, 2012 and 2013, broken down by zip code.

Respectfully submitted,



Eileen L. Ordovery
Lisa Kilkelly
LEGAL AID SOCIETY, INC.
416 W. Muhammad Ali Blvd., Ste. 300
Louisville, Kentucky 40202
Telephone: (502) 584-1254
Facsimile: (502) 584-8014
Email: EOrdovery@laslou.org
LKilkelly@laslou.org

Counsel for ACM

CERTIFICATE OF COMPLIANCE AND SERVICE


In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s February 17, 2014 electronic filing of the foregoing Tendered First 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 February 17, 2014; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and one copy in paper medium are being mailed to the Commission on February 17, 2014.

I further certify that in accordance with 807 KAR 5:001, Section 4(8), the foregoing Tendered First Requests For Information of Association of Community Ministries, Inc. is being contemporaneously provided via electronic mail to:

Edwin R. Staton
Vice President, State Regulation and Rates
LG&E and KU Services Company
ed.staton@lge-ku.com

Allyson K. Sturgeon
Senior Corporate Attorney
LG&E and KU Services Company
allyson.sturgeon@lge-ku.com

Kendrick R. Riggs
W. Duncan Crosby III
Joseph T. Mandlehr
Stoll Keenon Ogden PLLC
kendrick.riggs@skofirm.com
duncan.crosby@skofirm.com
joseph.mandlehr@skofirm.com



Eileen Ordovery
Counsel for ACM