

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)	

TESTIMONY OF
MARLON CUMMINGS

ASSOCIATION OF
COMMUNITY MINISTRIES, INC.

ON BEHALF OF
ASSOCIATION OF COMMUNITY MINISTRIES, INC.

Filed: April 14, 2014

1 **Q. Please state your name, title and address.**

2 **A.** My name is Marlon Cummings and I am Treasurer of the Board of Directors of the
3 Association of Community Ministries (“ACM”). I have been appointed by the Board to represent
4 ACM on all low-income utility issues. My business address is P.O. Box 99545, Louisville,
5 Kentucky 40269.

6 **Q. Describe your employment and educational background.**

7 **A.** Currently and for the past 18 years I have been Executive Director of Jeffersontown Area
8 Ministries, which is one of the member agencies of ACM and which provides emergency utility
9 and rental assistance and a variety of other social services to residents in the Jeffersontown area.
10 I have been on the Board of Directors of ACM since 1994. I served the Jeffersontown Christian
11 Church (Disciples of Christ), from 1985 until 1996, as the Family and Youth Minister. I have a
12 Bachelor of Arts in Business from Bellarmine University and received my Minister’s license
13 from the Kentucky Region of the Christian Church (Disciples of Christ) in conjunction with the
14 Lexington Theological Seminary.

15 **Q. Have you previously testified before the Commission?**

16 **A.** Yes, I filed testimony in the last three LG&E base rate cases, Case No. 2012-00222,
17 *Application Of Louisville Gas And Electric Company For Adjustment Of Its Electric And Gas*
18 *Rates, A Certificate Of Convenience And Necessity, Approval Of Gas Service Lines And Risers,*
19 *And A Gas Line Surcharge*, Case No. 2009-00549, *In the Matter of Application of Louisville Gas*
20 *and Electric Company for an Adjustment of Electric and Gas Base Rates* on behalf of ACM and
21 in Case No. 2008-00252, *In the Matter of Application of Louisville Gas and Electric Company*
22 *for an Adjustment of its Electric and Gas Base Rates* on behalf of ACM and POWER. I have
23 also filed testimony in the following matters: Case No. 2011-00134, *Joint Application of Louisville*
24 *Gas & Electric Company and Kentucky Utilities Company for Review, Modification, and*

1 *Continuation of Existing, and Addition of New, Demand-Side Management and Energy-Efficiency*
2 *Programs; Case No. 2010-00204, In the Matter of Joint Application of PPL Corporation, E.ON*
3 *AG, E.ON US Investments Corp., E.ON U.S. LLC, Louisville Gas and Electric Company and*
4 *Kentucky Utilities Company for Approval of an Acquisition of Ownership and Control of*
5 *Utilities; Case No. 2010-00146, An Investigation of Natural Gas Retail Competition Programs;*
6 *Case No. 2006-00045, In The Matter Of: Consideration of the Requirements of the Federal*
7 *Energy Policy Act of 2005 Regarding Time-based Metering, Demand Response and*
8 *Interconnection Service and in Case No. 2007-00477, In the Matter of: An Investigation of the*
9 *Energy and Regulatory Issues in Section 50 of Kentucky’s 2007 Energy Act.*

10 **Q. What is the purpose of your testimony?**

11 **A.** I offer this testimony to emphasize the importance of affordable energy efficiency
12 opportunities for low income utility customers, including tenants, and to offer comments on
13 selected aspects of the Companies’ proposed 2015-2018 DSM/EE Program Plan.

14 **Q. Please describe ACM.**

15 **A.** ACM is a Kentucky 501(c)(3) nonprofit corporation and its membership is comprised of 14
16 independent community ministries that provide various social services to the Louisville Metro
17 area. The common mission for all 14 members is to provide an emergency assistance network in
18 partnership with the Louisville Metro Government, local congregations, and other businesses and
19 organizations. Each Ministry serves a specific geographical area to ensure that all of Louisville
20 Metro is covered under the umbrella of the ACM. Among the social services provided by ACM
21 members are utility assistance programs.

22 **Q. Describe ACM’s activities with respect to helping utility customers in need.**

23 **A.** Our member agencies provide utility assistance to low-income persons year round. To
24 qualify for service, clients must live in the agency’s service area and be in threat of

1 disconnection of service. Our agencies help clients negotiate payment plans with the utility
2 companies when they fall behind, and help them avoid utility disconnections. The agencies
3 obtain funding from donations and local governments grants. These agencies also distribute
4 Community Winterhelp funds from January through April each year.

5 **Q. How do ACM agencies work with LG&E to help low income utility customers?**

6 **A.** ACM is one of the joint applicants for the current Louisville Gas & Electric Company Home
7 Energy Assistance Program. Representatives of ACM participate in the LG&E and KU
8 Customer Commitment Advisory Forum and Energy Efficiency DSM Advisory Group. Since
9 2010, LG&E has donated shareholder funds to ACM for use in assisting low income utility
10 customers. LG&E's current annual contribution to ACM is \$412,500.

11 **Q. Why is ACM interested in LG&E's demand-side management and energy-efficiency**
12 **programs?**

13 **A.** ACM has an interest in DSM/EE programs as an assistance provider and advocate for low
14 income utility customers in the LG&E service territory. Through its work providing financial
15 assistance to customers in crisis, ACM agencies often see clients with high utility bills that the
16 agencies do not have sufficient funds to completely cover. To the extent that EE programs can
17 assist these clients to lower their bills, assistance dollars can go further in helping to eliminate
18 the threat of service disconnections for nonpayment. ACM recognizes that demand reduction
19 benefits all customers by delaying the need to invest in greater generation capacity and that a
20 successful suite of DSM programs will include offerings that appeal to different customer classes
21 and populations. But low income customers face economic challenges with respect to DSM/EE
22 programming that others do not. Increasing DSM/EE charges add to rising utility costs overall,
23 which are already unaffordable for many low income customers. At the same time, the efficiency
24 measures that are promoted through some of the residential programs are out of reach. There is a

1 need for DSM/EE programs that are available, affordable and useful to low income utility
2 customers to the greatest extent possible.

3 **Q. Do ACM agencies encourage clients to be energy efficient?**

4 **A.** Yes, ACM agencies routinely discuss energy conservation with clients in the context of
5 providing emergency assistance. For example, when I see a client with a high utility bill at
6 Jeffersontown Area Ministries, I mention such simple steps as lowering the thermostat settings
7 both when the clients are at home and further when they are away from home. When I see a high
8 electric charge on the bill of a client who is a combined gas and electric customer, this indicates
9 the client is using a space heater and I educate the client on usage of space heaters. ACM
10 agencies also host weatherization workshops where clients learn how to weatherize their homes
11 and receive free weatherization supplies such as caulk, tape and instructions. These workshops
12 are conducted by Project Warm, a nonprofit organization which provides free weatherization
13 services and education to low income families in Louisville. We encourage clients to take
14 advantage of free CFL bulbs, and we also make referrals to WeCare and Project Warm for
15 clients who qualify for more expensive measures such as water heaters.

16 **Q. What are ACM's comments about LG&E and KU's proposed 2015-2018 DSM/EE
17 Program Plan?**

18 **A.** First, ACM would like to address the Residential Conservation/Home Energy Performance
19 Program. Through this program, residential customers receive an on-site energy audit by a
20 certified energy analyst who assesses the efficiency of the customer's home and provides a report
21 with energy saving improvement recommendations. Customers who achieve up to 30% more
22 efficiency in the home through implementation of energy saving improvements will be eligible
23 for up to \$1,000 in incentives to offset measure installation costs. (Direct Testimony of Michael
24 E. Hornung, Exhibit MEH-1 at 39)

1 **Q. What are ACM's comments regarding the Residential Conservation/Home Energy**
2 **Performance Program?**

3 **A.** Previously, ACM did not identify this program as having great potential for participation by
4 low income residents due to the high costs of implementing the energy efficiency measures
5 recommended through the program. But it appears that LG&E has begun to allow owners of
6 multi-family housing to participate, which has potential to positively impact more low income
7 customers. This came to ACM's attention through data provided by the Companies in Response
8 to ACM's First Requests for Information. In Request No. 6 (e) and (f), ACM requested the
9 number of customers in Jefferson County who received financial incentives through the
10 Residential Conservation/Home Energy Performance Program for achieving the required degree
11 of savings, as well as the dollar amount of incentives broken down by zip code.

12 **Q. What did this data reveal?**

13 **A.** The number and amount of incentives in the 40215 zip code were significantly larger than in
14 any other zip code in Jefferson County. In 2013, the first full year of the incentive component,
15 40215 accounted for 57% of the number of customers who received incentives, and 61.5% of the
16 total amount of incentives. We were surprised by the magnitude of the disparity between this one
17 zip code and all other zip codes in Jefferson County. Additionally, the 40215 zip code
18 encompasses an area of high poverty in Jefferson County. According to the U.S. Census Bureau
19 2008 - 2012 American Community Survey 5-Year Estimates, 35% of the residents of 40215 live
20 below the poverty level, making it the seventh poorest of the 39 Jefferson County zip codes in
21 which LG&E serves residential customers. The poverty rate in 40215 is more than double the
22 poverty rate for Jefferson County as a whole, which is 16.5%.

23

24

1 **Q. What is the reason for the high percentage of financial incentives in zip code 40215?**

2 **A.** According to LG&E’s Response to ACM’s Supplemental Requests for Information No. 2,

3 “[t]he reason for the high figures in zip code 40215 is related to a
4 large multi-family complex that participated in the Residential
5 Conservation Program and subsequently completed the
6 requirements for the incentive portion of the program.”
7

8 **Q. Does the data suggest that customers in low income areas in general are participating in**
9 **the Residential Conservation/Home Energy Performance Program?**

10 **A.** It appears that some customers in low income areas are participating in both the on-line and
11 on-site audits. However, only a very few low income customers made sufficient efficiency
12 improvements to qualify for the incentive portion of the program. In ACM’s First Requests for
13 Information, (ACM-1) Question No. 6(a), ACM asked for a breakdown by zip code of the
14 number of on-line audits done in each of the years 2011, 2012 and 2013. We looked at these
15 numbers in the ten zip codes with the highest percentage of poverty in Jefferson County,
16 compared to the total on-line audits done in Jefferson County. These ten zip codes with
17 corresponding poverty rates are listed in Exhibit MC-1 to this Testimony. The data showed the
18 following.

19 On-line Audits Response to ACM-1, Question No. 6(a)

	2011	2012	2013
# on-line audits Jefferson County	3,199	1,736	2,733
# on-line audits in top 10 high poverty zip codes	382	211	351
% on-line audits in top 10 high poverty zip codes	11.9	12.2	12.8

20
21 The number of residential customers in the top ten highest poverty zip codes is approximately
22 20.4% of the number of LG&E residential customers in Jefferson County as a whole. So, this
23 data suggests that low income customers are participating in the on-line audits, though at a lower
24 rate than would be expected given the number of customers in those zip codes.
25

1 **Q. What did the data reveal when you looked at the number of on-site audits?**

2 **A.** The chart below shows the number and percentage of on-site audits done in the ten zip codes
3 with the highest poverty rates.

4 On-site Audits Response to ACM -1 Question No. 6(c)

	2011	2012	2013
Number of on-site audits Jefferson County	559	532	1,067
Number on-site audits in top 10 high poverty zip codes	62	59	307*
% on-site audits in top 10 high poverty zip codes	11.1	11.1	28.8

5 *229 of these in 40215

6 The percentage of customers in the top ten high poverty zip codes was approximately 11% in
7 2011 and 2012 but jumped to almost 29% in 2013 due to a very large spike in the 40215 zip
8 code. We suspect that the 2013 increase in 40215 is a result of the multi-family property that
9 LG&E referenced in ACM-2, Question No.2. In 2011 and 2012 only 4 and 5 on-site audits were
10 done respectively in 40215, but in 2013 two-hundred twenty-nine of the 307 on-site audits in
11 high poverty zip codes were done there. No other zip code in the entire county had such a large
12 number of on-site audits or such a large increase.

13 **Q. Apart from the multi-family complex in 40215, are low income customers benefitting**
14 **from the incentive component of the program in which customers who achieve certain**
15 **levels of energy savings receive financial incentives?**

16 **A.** Very few are. None of the six customers receiving incentives in 2012 came from the top ten
17 high poverty zip codes. Apart from the 172 incentives in 40215, only seven out of the remaining
18 128 incentives in the rest of Jefferson County were from the top ten high poverty zip codes. The
19 charts below show the number and percentage of customers receiving incentives and the amount
20 of incentives in the top ten zip codes with the highest poverty rates.

21

22

1 Customers Receiving Incentives for Achieving Energy Savings Response to ACM-1 Question No. 6(e)

	2011	2012	2013
# of Customers receiving Incentives Jefferson County	0	6	300
# of Customers receiving Incentives in top 10 high poverty zip codes	0	0	179*
% Customers receiving incentives in top 10 high poverty zip codes	0	0	59.7

2 *172 of these in 40215

3 Total Incentive Payments for Achieving Energy Savings Response to ACM-1 Question No. 6(f)

	2011	2012	2013
Total Incentive Payments Jefferson County	0	\$6000	\$279,000
Total Incentive Payments in top 10 high poverty zip codes	0	0	\$177,500*
% Incentive Payments in top 10 high poverty zip codes	0	0	63.6

4 *\$171,500 in 40215

5 **Q. What other observations does the data about low income participation in the**
 6 **Residential Conservation/Home Energy Performance program suggest?**

7 **A.** While the 11 to 12% of high poverty area participants in the on-line and on-site audits are
 8 lower than what would be expected based on the fact that these areas make up 20% of the
 9 number of Jefferson County customers, the presence of participants from high poverty areas in
 10 these components suggests that low income customers are interested in efficiency opportunities.
 11 However, the much lower number of low income customers who can achieve energy savings
 12 sufficient to qualify for incentives suggests that the costs of making significant investments in
 13 efficiency is prohibitive to many low income customers. This is not surprising, based on ACM's
 14 experience with its clients. LG&E and KU anticipate average customer expenses of from \$900
 15 up to \$3,500 to achieve the required energy savings for the incentives proposed, which range
 16 from \$300 to \$1,000. (LG&E and KU's 2015-2018 Demand-Side Management and Energy
 17 Efficiency Program Plan, Exhibit MEH-1 to the Direct Testimony of Michael E. Hornung, page
 18 41). Up front expenditures of this magnitude are generally far beyond the means of low income
 19 customers.

20

1 **Q. Did ACM analyze participation in the Residential Conservation/Home Energy**
 2 **Performance Program by low income customers by any other measures?**

3 **A.** Yes, we also requested data about the numbers of Jefferson County customers who
 4 participated in the various components of the program and had at least one LG&E bill paid by a
 5 third-party assistance provider during the period from 2011 through 2013.

6 **Q. What did the data on participation by third party assistance recipients show?**

7 **A.** Below are tables comparing the numbers of third party assistance recipients to the overall
 8 numbers of participants in Jefferson County. For comparison, the number and percentage of
 9 Jefferson County customers receiving third party assistance payments for 2011 through 2013 are
 10 listed below.

11 **Third Party Assistance Recipients Response to ACM-1 Question 28(b) and (c)**

	2011	2012	2013
# Customers Jefferson County	327,868	328,548	330,892
# Jefferson County 3d party assistance recipients	24,600	24,130	20,702
% Jefferson County 3d party assistance recipients	7.5	7.3	6.3

13 **On-line Audits Response to ACM-1, Question No. 6(a) and (b)**

	2011	2012	2013
# on-line audits Jefferson County	3,199	1,736	2,733
# on-line audits 3d party assistance recipients	154	82	126
% on-line audits 3d party assistance recipients	4.8	4.7	4.6

15 **On-site Audits Response to ACM -1 Question No. 6(c) and (d)**

	2011	2012	2013
Number of on-site audits Jefferson County	559	532	1,067
Number on-site audits 3d party assistance recipients	34	23	28
% on-site audits 3d party assistance recipients	6.1	4.3	2.6

17 **Customers receiving Incentive Payments for Achieving Energy Savings**
 18 **Response to ACM-1 Question No. 6(e) and (g)**

	2011	2012	2013
# of Customers receiving Incentives Jefferson County	0	6	300
# of 3d party assistance recipients receiving Incentives	0	0	1
% 3d party assistance recipients receiving Incentives	0	0	0.33

1 As with the high poverty zip codes, this data shows some participation in the on-line and on-site
2 components of this program, although a lower percentage than the percentage of customers who
3 received third party assistance. Only one customer from this population qualified for an
4 incentive.

5 **Q. Does ACM believe that encouraging more multi-family participation in this program**
6 **would lead to more energy efficient housing in high poverty areas?**

7 **A.** Yes. As the data suggests, due to the participation of one multi-family complex in a relatively
8 high poverty zip code, approximately 172 multifamily units are now significantly more energy
9 efficient. We would expect landlords to have more financial incentive and ability to make
10 recommended improvements that their tenants cannot afford. Although low income residents
11 typically do not have the up-front capital to invest in these energy efficiencies, landlords are
12 more likely to through their own working capital and greater financing opportunities. Multi-
13 family property owners may derive economic advantages from investing in their properties, such
14 as tax deductions. The ability to advertise energy efficiency improvements may provide property
15 owners marketing and competitive advantages to attract tenants. Due to these economic
16 advantages, multifamily property owners may be a receptive audience to the incentive
17 component of this program.

18 **Q. How would this help low income customers?**

19 **A.** More energy efficient housing means more opportunity to lower utility bills. For tenants who
20 pay their own utilities, this is a direct benefit. Even if the utilities are in the landlord's name,
21 lower bills may eliminate rent increases prompted by high utility costs. In either event, increased
22 expansion of this program to multifamily housing will mean that more low income tenants
23 benefit from it.

24

1 **Q. Do many of ACM's clients rent?**

2 **A.** Yes. Although we do not keep detailed statistics, I would estimate that at least 75% of our
3 clients are renters.

4 **Q. Does ACM support LG&E and KU's proposed changes to the Residential
5 Conservation/Home Energy Performance Program?**

6 **A.** ACM supports the explicit inclusion of multi-family housing within the tier structure of this
7 program as well as the addition of a tier for insulation and weatherization efforts. Further
8 participation in this program by multi-family properties has potential to positively impact many
9 low income customers who have not been able to derive significant benefit from this program.
10 The addition of a tier for insulation and weatherization may make the required energy savings
11 more achievable for smaller property owners who may not be able to afford the more expensive
12 measures required to qualify for higher incentives. ACM urges LG&E to aggressively market the
13 Residential Conservation/Home Energy Performance Program to owners of multi-family
14 properties that rent to low-income customers, and would welcome the opportunity to assist the
15 Company in identifying such properties in our service areas.

16 **Q. Turning now to another program, the Companies are seeking additional funds for the
17 Residential Incentives Program. What are ACM's observations about this proposal?**

18 **A.** It is ACM's understanding that the Companies seek to increase funding for its appliance
19 rebate program due to high participation among customers. This program has low participation
20 rates among customers in high poverty areas and third party assistance recipients.

21 **Q. What does the data regarding this program show?**

22 **A.** Looking at the dollar amount of incentives paid in the ten zip code areas with the highest
23 poverty rates reveals the following percentages.

24

1 Dollar amount Incentives through 2013 Response to ACM-1 Question No.10

	Through 2013
Dollar amount Incentives Jefferson County	\$2,170,690
Dollar amount Incentives in top 10 high poverty zip codes	\$172,260
% Dollar amount Incentives in top 10 high poverty zip codes	7.9

2
3 As stated before, the percentage of Jefferson County customers living in the top ten zip codes
4 with the highest poverty rates is approximately 20.4%. The percentage of customers receiving
5 incentives at 7.9%, is significantly lower than what would be expected given the percentage of
6 customers in those areas.

7 The percentages of incentive dollars paid to customers who were third party assistance recipients
8 are listed below.

9 Dollar amount Incentives through 2013 Response to ACM-1 Question No. 10

	Through 2013
Dollar amount Incentives Jefferson County	\$2,170,690
Dollar amount Incentives to 3d party assistance recipients	\$31,048
% Dollar amount Incentives paid to 3d party assistance recipients	1.4

10
11 The percentage of customers receiving third party assistance is in the 6 to 7% range from 2011
12 through 2013.

13 **Q. What do you conclude from this data?**

14 **A.** As with the incentive portion of the Residential Conservation/Home Energy Performance
15 Program, the expense involved makes it difficult for low income customers to participate. We
16 would expect that the high cost of Energy Star appliances, high efficiency HVAC systems and
17 qualifying window film are driving the low participation rates.

18 **Q. Does ACM have comments to offer about any other aspect of the Companies' DSM/EE
19 program?**

20 **A.** In our first and supplemental information requests, ACM asked for considerable information
21 about the current operation of the WeCare program. WeCare remains a critical program for low

1 income customers, and we were glad to see that LG&E met its participation goals for 2011 and
2 2012, though it fell short in 2013, and is attempting to position itself to meet the higher targets
3 set for upcoming years by increasing its collaboration with Louisville Metro community
4 organizations that interact with low income consumers. ACM also notes that the Companies
5 have made adjustments to the WeCare program that allow for greater participation by customers
6 living in multi-family housing: whereas program rules in place at the time of Case No. 2011-
7 00134 excluded otherwise-eligible customers who lived in buildings of more than 8 units, current
8 policy allows for WeCare weatherization in multi-unit buildings of any size. (Response to First
9 Request for Information of ACM, Question No. 23(b) and (c).) This should allow more low
10 income customers to benefit from energy efficiencies and reduced energy bills.

11 **Q. Are there additional steps that ACM would like to see the Companies take at this time**
12 **in regard to multi-family housing?**

13 **A.** As I stated earlier, ACM would like to see the Residential Conservation/Home Energy
14 Performance program aggressively marketed to multi-family properties in Louisville, particularly
15 those serving low income renters. We would also like to see LG&E gather data and undertake
16 studies and analyses for the specific purpose of designing new energy efficiency, conservation
17 and demand side management programs targeting multi-family housing in Louisville Metro.

18 **Q. Does ACM have any concerns regarding the Advanced Metering Systems (AMS)**
19 **program proposed by the Companies?**

20 **A.** ACM generally questions the precedent to be set by approving as part of a DSM/EE plan a
21 program not predicted to produce any energy savings, or change patterns of customer usage.
22 Beyond that, we are concerned that the AMS program will not be available, affordable and
23 useful to low income customers, as required by KRS 278.285(1)(g), in that the Companies'
24 proposal calls for customers to access their usage information through a web portal. Low income

1 households have low rates of home internet access. According to a 2011 report prepared by the
2 U.S. Department of Commerce, while 70% of U.S. households had home internet access in 2010,
3 only 46% of households with annual income below \$25,000 did.¹ Another study found that 46%
4 of low income households lack a computer.² In light of these disparities and the experience of
5 ACM member agencies, we would not anticipate much low income participation in the AMS
6 program proposed.

7 **Q. Does ACM have any other concerns regarding the proposed AMS program?**

8 **A.** ACM is extremely concerned about the potential use of smart meter technology, such as the
9 AMS proposed here, to be used in the future to remotely disconnect low income customers who
10 are struggling with their energy bills. We recognize, though, that the Companies are not currently
11 proposing such a use, and that any such future proposal would be thoroughly aired before the
12 Commission in an appropriate proceeding

13 **Q. Does this conclude your testimony?**

14 **A.** Yes.

¹ Economics and Statistics Administration, National Telecommunications and Information Administration, U.S. Department of Commerce, *Exploring The Digital Nation: Computer and Internet Use at Home* (November 2011) accessed via www.ntia.doc.gov/report/2011/exploring-digital-nation-computer-and-internet-use-home .

² Connected Nation, *Broadband Adoption Among Low-Income Households: Insights From Connected Nation Research* (July 2011), accessed at www.connectednation.org/sites/default/files/bbadoptionamonglow-incomehh_final_071111.pdf .

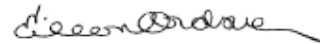
**Ten Jefferson County Zip Codes With Highest Percentage of Residents
Living Below Poverty Level**

Zip Code	% Below Poverty
40203	52.3
40209	46.3
40210	46.1
40202	45.6
40208	38.6
40211	37.7
40215	35.1
40212	34.3
40213	23.4
40218	21.6
Jefferson County	16.5%

Source: U.S. Census Bureau, 2008-2012 American Community Survey 5-year Estimates

CERTIFICATE OF COMPLIANCE AND SERVICE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s April 14, 2014 electronic filing of the foregoing Testimony of Marlon Cummings on Behalf 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 April 14, 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 is being mailed to the Commission on April 14, 2014.



Eileen Ordovery
Counsel for ACM