

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

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY AND KENTUCKY UTILITIES)	
COMPANY FOR REVIEW, MODIFICATION, AND)	CASE NO.
CONTINUATION OF EXISTING, AND ADDITION OF)	2014-00003
NEW, DEMAND-SIDE MANAGEMENT AND ENERGY)	
EFFICIENCY PROGRAMS)	

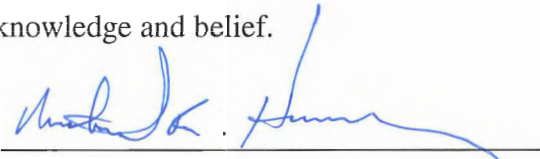
**RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
TO THE SUPPLEMENTAL REQUESTS FOR INFORMATION
OF THE ASSOCIATION OF COMMUNITY MINISTRIES, INC.
DATED MARCH 18, 2014**

FILED: APRIL 3, 2014

VERIFICATION

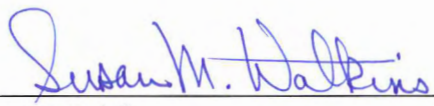
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Michael E. Hornung**, being duly sworn, deposes and says that he is Manager of Energy Efficiency Planning & Development for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Michael E. Hornung

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of April 2014.



Notary Public (SEAL)

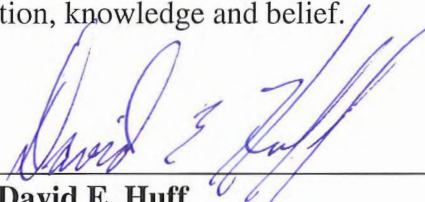
My Commission Expires:

~~SUSAN M. WATKINS
Notary Public, State at Large, KY
My Commission Expires Mar. 10, 2017
Notary ID # 485723~~

VERIFICATION

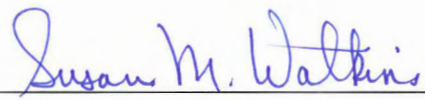
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **David E. Huff**, being duly sworn, deposes and says that he is Director of Customer Energy Efficiency & Smart Grid Strategy for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and that the answers contained therein are true and correct to the best of his information, knowledge and belief.



David E. Huff

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of April _____ 2014.



Notary Public (SEAL)

My Commission Expires:

SUSAN M. WATKINS
Notary Public, State at Large, KY
My Commission Expires Mar. 10, 2017
Notary ID # 495723

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 1

Witness: Michael E. Hornung

Q-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.

A-1.

- (a) This calculation represented residential LG&E customers at the end of 2011, 2012 and 2013, respectively. Any customers who had electric/gas service for less than 12 months were removed from the calculation, as to not skew the "annual" results. Line-by-line (customer-by-customer) data of these customers' annual total DSM contribution was aggregated and averaged to arrive at the final dollar amount submitted in ACM 1-3. For example, at the end of 2011, there were 204 residential LG&E customers in the zip code 40010. Of those 204, 187 had at least 12 months of service. The total DSM contribution of these customers for the previous 12 months summed to \$9,463.93. When that value is divided by the number of customers (187) the result is \$50.61, as provided in the response to ACM 1-3.
- (b) Yes, the amounts provided in the table include the average annual DSM bill impact for both residential gas and electric service.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
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Case No. 2014-00003

Question No. 2

Witness: Michael E. Hornung

- Q-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.
- A-2. The reason for the high figures in zip code 40215 is related to a large multi-family complex that participated in the Residential Conservation program and subsequently completed the requirements for the incentive portion of the program.

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Supplemental Requests for Information
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Case No. 2014-00003

Question No. 3

Witness: Michael E. Hornung

Q-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?

A-3.

- (a) The Companies do not require a Landlord Consent form but rather a Landlord Disclosure form for those homes that qualify for a rebate. This is to show that the landlord has been made aware of the rebate and to determine who should receive the rebate.
- (b) There were 9 disclosure forms signed in 2013 and 0 in 2012.
- (c) No, the Companies do not track indicia of renter status.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

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Supplemental Requests for Information
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Case No. 2014-00003

Question No. 4

Witness: Michael E. Hornung

- Q-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?
- A-4. Yes. The figures provided represent newly-installed load control switches for each year.

LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY

Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
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Case No. 2014-00003

Question No. 5

Witness: Michael E. Hornung

- Q-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).
- A-5. The figures provided reflect bill credits only. See the tables below for information on the sign-up incentives. Note: Sign-up incentives began in 2012.

The table below represents the dollar value of sign-up incentives awarded to Jefferson County customers.

<u>Zip Code</u>	<u>2012</u>	<u>2013</u>	<u>Zip Code</u>	<u>2012</u>	<u>2013</u>
40018	\$10	\$20	40216	\$780	\$6,340
40023	\$60	\$100	40217	\$200	\$1,640
40059	\$260	\$2,180	40218	\$430	\$2,600
40118	\$60	\$1,000	40219	\$520	\$6,770
40202	\$90		40220	\$770	\$4,480
40203	\$190	\$1,370	40222	\$570	\$2,720
40204	\$320	\$1,640	40223	\$700	\$2,660
40205	\$620	\$3,140	40228	\$360	\$2,100
40206	\$370	\$2,440	40229	\$520	\$4,160
40207	\$560	\$3,590	40241	\$480	\$2,950
40208	\$120	\$1,040	40242	\$250	\$1,380
40209	\$10	\$20	40243	\$260	\$1,180
40210	\$380	\$2,810	40245	\$560	\$3,220
40211	\$730	\$2,900	40258	\$430	\$4,340
40212	\$500	\$2,600	40272	\$1,260	\$5,180
40213	\$260	\$2,500	40291	\$680	\$4,980
40214	\$670	\$6,180	40299	\$9,665	\$4,300
40215	\$370	\$1,580			

The table below represents the dollar value of sign-up incentives paid to customers who had at least one LG&E bill paid by a third-party assistance provider during the period 2011 through 2013.

<u>Zip Code</u>	<u>2012</u>	<u>2013</u>	<u>Zip Code</u>	<u>2012</u>	<u>2013</u>
40118	\$10	\$140	40217		\$40
40203	\$50	\$370	40218	\$10	\$160
40204	\$30	\$60	40219	\$20	\$410
40206		\$20	40220	\$20	\$40
40207		\$40	40222	\$10	\$100
40208	\$10	\$120	40223	\$20	\$80
40209	\$10		40228	\$30	\$80
40210	\$110	\$1,110	40229	\$30	\$220
40211	\$210	\$1,050	40241		\$20
40212	\$150	\$720	40242	\$20	
40213	\$40	\$80	40258	\$40	\$460
40214	\$20	\$440	40272	\$150	\$500
40215	\$80	\$240	40291	\$10	\$310
40216	\$80	\$1,020	40299	\$295	\$160

As previously noted in the Companies' response to ACM 1-7(e), incentive data based on status as a renter is not readily available, and possibly indeterminable.

**LOUISVILLE GAS AND ELECTRIC COMPANY
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**Response to the Association of Community Ministries, Inc.
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Case No. 2014-00003

Question No. 6

Witness: Michael E. Hornung

- Q-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?

A-6.

- (a) The amount of signed landlord consent forms for 2011, 2012 and 2013 are provided in the table below.

	2011	2012	2013	Total
Total Signed Consent Forms	171	339	90	600

- (b) The number of renters receiving incentives under the Demand Conservation Program is possibly indeterminable because the Companies do not track its customer records by status of "renter". As electric and/or gas utility accounts are set up, the companies do not ask for or track the customer's status as a renter. However, as enrollment requests are received for DSM programs, the Companies make every effort to determine if the premise is occupied by a renter, and if so, require a landlord consent form. For example, if an enrollment request was received from a customer whose premise is noticeably an apartment complex, the enrollment is delayed until a

completed landlord consent form is (sent to and) received from the customer. Alternatively, if a customer who rents a single-family home requests enrollment in a DSM program, they are enrolled without the requirement of a landlord consent form unless they disclose that they are renting, and then a landlord consent form is required, as the Companies have no process in place to identify their occupation of that premise as “renter”.

- (c) The Companies can accurately and definitively label customers who participate in DSM programs with a completed landlord consent form or a multi-family agreement (Demand Conservation) as being “renters”. However, when considering examples like that provided at the end of part (b) above, the Companies cannot accurately and definitively capture all of the true “renters” who participate in DSM programs.

**LOUISVILLE GAS AND ELECTRIC COMPANY
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**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 7

Witness: Michael E. Hornung

- Q-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.
- A-7.
- (a) See the response to Question No. 5.
 - (b) This data is not readily available, and possibly indeterminable.
 - (c) See the response to Question No. 5.
 - (d) The incentives were marketed to all residential customers not already participating in Demand Conservation who were also within the program's paging territory. These marketing efforts included telemarketing, direct mail, email solicitation and contact with our multi-family business partners.

**LOUISVILLE GAS AND ELECTRIC COMPANY
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**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 8

Witness: Michael E. Hornung

- Q-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.
- A-8.
- (a) When a landlord enrolls an entire multi-family facility, the landlord and tenant will each receive \$2 per air conditioner or heat pump for each summer month of participation. The landlord receives a check towards the end of the year for the entire facility while the tenant receives a \$2 bill credit per air conditioner or heat pump for each summer month of participation.

When a multi-family tenant initiates enrollment where the entire facility is not enrolled and the tenant receives landlord consent, only the tenant will receive a \$2 bill credit per air conditioner or heat pump for each summer month of participation.

- (b) When a landlord enrolls an entire multi-family facility, the landlord will receive a \$25 bonus incentive per air conditioner, heat pump, or water heater enrolled. The property owner receives this incentive even if the tenants are individual customers as the property owner is considered to be responsible for the property, maintenance, and replacement on a holistic basis, thus they are provided the incentive when initiating enrollment of the entire facility. When a multi-family tenant initiates enrollment where the entire facility is not enrolled and the tenant receives landlord consent, the tenant will receive the \$25 bonus incentive the disclosure through the landlord consent form is considered notification to the property owner that the tenant is requesting and making changes to the facility equipment.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 9

Witness: Michael E. Hornung

- Q-9. Please provide the incentive amount per refrigerator under the Refrigerator Removal Program since its inception.
- A-9. Since inception of the program in March, 2012 until February 28, 2013 the rebate was \$30 per refrigerator. The rebate was then increased to \$50 on March 1, 2013.

**LOUISVILLE GAS AND ELECTRIC COMPANY
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Case No. 2014-00003

Question No. 10

Witness: Michael E. Hornung

- Q-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.
- A-10. Yes, "lighting retrofit/replace" refers only to replacing incandescent bulbs with CFLs at the premise.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 11

Witness: Michael E. Hornung

- Q-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.
- A-11. Tier C homes are typically larger homes when compared to tiers A and B. The Companies have found that many of these homes already have some level of energy savings weatherization measures installed, therefore limiting our ability to install to the full amount allowed by the WeCare program as recommended from the NEAT Audit Tool.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 12

Witness: Michael E. Hornung

- Q-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?
- A-12. Yes. An example of this is the efforts that have taken place to support low-income customers, who lack the up-front capital to make large purchases to participate in the Residential Incentives Program. The Companies have designed the program to allow low-income agencies such as CAC's receive the rebate when an appliance is purchased for a qualifying customer. Additionally, discussions with agencies in Louisville have centered around how one agency can refer someone in need to another program; while no definitive solution has been found, the group continues to look for ways to maximize the benefits to the customers in need.

**LOUISVILLE GAS AND ELECTRIC COMPANY
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**Response to the Association of Community Ministries, Inc.
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Dated March 18, 2014**

Case No. 2014-00003

Question No. 13

Witness: Michael E. Hornung

Q-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.

A-13.

- (a) & (b) The table below provides program targets and performance for 2011-2013.

WeCare Program Targets and Participation by Year

	<u>2011</u>	<u>2012</u>	<u>2013</u>
LG&E	600	600	850
Actuals	619	618	736
Variance	19	18	-114

- (c) The Companies have QC methodology in place as it relates to actual ECM installation against NEAT Tool recommendations through a manual validation process and contractor performance is assessed through a contractor scoring card. See attachment to the response to AG 1-18 to review a scorecard template. These monitoring efforts allow the Companies to monitor progress being made towards meeting WeCare Program targets and goals. The Companies do not have other reports, memoranda, reviews, or evaluations of the WeCare program which have are not already part of the record.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

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Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 14

Witness: Michael E. Hornung

- Q-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.
- A-14. The Companies currently have a process in place that permits any Community Action Agency that uses the National Energy Audit Tool (NEAT) and meets other program specifications to participate. The Community Action Agency applies for a rebate up to the WeCare tier maximums based on installed measures for the qualifying premises.

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**Response to the Association of Community Ministries, Inc.
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Dated March 18, 2014**

Case No. 2014-00003

Question No. 15

Witness: Michael E. Hornung

Q-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.

A-15.

- (a) The Companies are members of several organizations which include but are not limited to the Midwest Energy Efficiency Alliance; E-Source; Chartwell and the Consortium for Energy Efficiency. These utility industry organizations provide research on emerging technologies, training and education, products and programs within energy efficiency. Through these memberships, the Companies are able to monitor and review utility research for over 300 utilities. Through monthly, quarterly and yearly peer meetings through these memberships, the Companies are able to participate in activities with other utilities on program effectiveness. These networks allow the Companies to leverage their network and accumulation of extensive data in specific programs across the country to again review effective processes energy efficiency programming.
- (b) The Companies utilize best practices amongst peer utilities across the country to help develop cost-effective methods of marketing the program to customers who are most likely to participate.

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Case No. 2014-00003

Question No. 16

Witness: Michael E. Hornung

Q-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.

A-16. The rebate process is as follows:

1. CAG sends LG&E an enrollment request
2. LG&E verifies customer eligibility
3. CAG provides PDF of customer acknowledgement for participation
4. CAG provides status dates to LG&E via FTP
5. Weatherization measures are completed
6. CAG provides LG&E with supporting documentation for work
7. System processes a rebate to CAG for services performed

The process allows CAGs to work independently while providing LG&E customers with WeCare program benefits. LG&E is currently collaborating with Project Warm, Affordable Energy Corporation, and Community Action Kentucky.

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Case No. 2014-00003

Question No. 17

Witness: Michael E. Hornung

Q-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?

A-17.

- (a) For the Demand Conservation Program, Customer can enroll in the program online or by calling our Customer Service Department and are asked if they are renters. A Landlord Consent form is then mailed to the customer, along with a self-addressed, postage paid return envelope. It is the responsibility of the customer to give the form to the owner for their signature.
- (b) The only way the Companies know if the customer is a renter and thus require a Landlord Consent Form is by the customer indicating to us that they rent or that they are the landlord and wish to enroll their properties into a program.
- (c) In both the Fridge and Freezer programs, the utility account holder can enroll themselves at any point for either program but in cases where the utility service is not in the landlord's name a third-party application is provided. For the Fridge and Freezer Recycling Program, at time of pickup the customer signs an acknowledgment certifying their ownership rights to the appliance being removed or that they are an authorized representative of the owner. For the Home Energy Rebates Program, the terms and conditions of participation require proof of purchase from every participant as well requiring that if the customer is a renter then they are responsible for obtaining the property owner's permission to install the product that qualifies for the rebate.

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Case No. 2014-00003

Question No. 18

Witness: Michael E. Hornung

Q-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.

A-18.

- (a) As stated in the Companies' response to ACM 1-11, LG&E does not review its residential DSM/EE program participation by any customer characteristic (i.e. zip code, owner- versus tenant-occupied, multi-family dwelling, or number of units in building). The Companies review the programs in the DSM/EE Portfolio ongoing through evaluation, measurement, and verification efforts to ensure the programs are performing to their approved energy and demand targeted levels.
- (b) The Companies do not track information by multi-family dwelling type.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 19

Witness: Michael E. Hornung

Q-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 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.

A-19.

- (a) The third- party vendor is Opower, Inc. The status of the current contract is ongoing.

- (b) The demographic data housed by the third-party vendor from said contract is not provided to LG&E. The data consists of what the vendor has been able to purchase and/or obtain from national, state, and local sources, such as Jefferson County PVA data. The vendor has some restrictions especially in regards to those purchased data sets.
- (c) See the attachment to response to PSC 1-24 for ICF International Report.
- (d) The companies have explored correlating external demographic data with known customer information. The companies have determined that matching external data to customer information is difficult and results in very low match rates. The result is that meaningful information for DSM information cannot be attained.
- (e) See the response to parts (b) and (d) which are consistent with the response to ACM 1-11.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
Supplemental Requests for Information
Dated March 18, 2014**

Case No. 2014-00003

Question No. 20

Witness: David E. Huff

- Q-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?
- A-20. The Companies disagree with the premise of this question. The Companies did not select zip codes to include in the survey. Rather, the Companies selected customers for whom the Companies have e-mail addresses on file. The list provided in response to ACM 1-25(a) indicates where customers with e-mail addresses reside.

**LOUISVILLE GAS AND ELECTRIC COMPANY
KENTUCKY UTILITIES COMPANY**

**Response to the Association of Community Ministries, Inc.
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Case No. 2014-00003

Question No. 21

Witness: Michael E. Hornung

- Q-21. Please provide the supporting calculations for the Companies' response to Request No. 27 of ACM's Tendered First Requests for Information.
- A-21. The calculations below represent all customers who, for each of the periods 2011, 2012 and 2013 had electric or gas usage greater than zero and also had at least one bill paid by a third-party assistance provider at some time during the period 2011 through 2013.

	2011		2012		2013	
	kWh	CCF	kWh	CCF	kWh	CCF
(a) Total Usage	231,605,758	10,653,188	232,772,621	9,075,317	215,330,970	10,490,715
(b) # of customers	18,385	14,976	18,952	15,270	17,972	14,486
(c) = (a) ÷ (b)	12,598	711	12,282	594	11,981	724
(c) ÷ 12 months	1,050	59	1,024	50	998	60