

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY FOR AN)	CASE NO. 2014-00372
ADJUSTMENT OF ITS ELECTRIC)	
AND GAS RATES)	

**DATA REQUESTS OF
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO ASSOCIATION OF COMMUNITY MINISTRIES, INC.**

Louisville Gas and Electric Company (“LG&E”) respectfully submits the following data requests to Association of Community Ministries, Inc. (“ACM”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 12, 2014.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, ACM, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if ACM receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If ACM objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of ACM, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

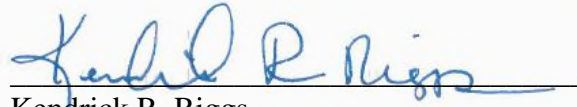
Mr. Cummings

1. Mr. Cummings states, “The large increases in the fixed Basic Service Charges mean that clients lose the ability to save money by conserving energy.”¹
 - a. Does ACM acknowledge that an energy-saving measure or approach that reduced a residential customer’s electric usage by an average of 200 kWh per month would represent an energy savings of over 20% per month for an average LG&E residential customer? Does ACM agree such an energy savings would be significant?
 - b. Does ACM acknowledge that an energy-saving measure or approach that reduced a residential customer’s electric usage by an average of 200 kWh per month would produce bill savings under LG&E’s current Rate RS energy rate of \$16.15 per month, and that the same measure or approach would produce bill savings under LG&E’s proposed Rate RS energy rate of \$15.23 per month?
 - c. Is ACM aware of any of its clients that would implement an energy-saving measure or practice to save \$16.15 per month but would not implement the same energy-saving measure or practice to save \$15.23 per month, a savings difference of less than \$1.00 per month?
 - d. In light of ACM’s answers to the subparts above, please explain how reducing LG&E’s Rate RS energy rate from the current \$0.08076 per kWh to LG&E’s proposed \$0.07618 per kWh will cause ACM’s clients to “lose the ability to save money by conserving energy.”
2. What is the average monthly electric consumption of ACM’s clients who are LG&E electric customers?

¹ Cummings Testimony at 8.

Dated: March 23, 2015

Respectfully submitted,




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Counsel for Louisville Gas and Electric Company

CERTIFICATE OF COMPLIANCE

This is to certify that Louisville Gas and Electric Company's March 23, 2015 electronic filing of the Data Requests 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 23, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Data Requests is being mailed, by first class United States mail, postage prepaid, to the Commission on March 23, 2015.



Counsel for Louisville Gas and Electric Company