

**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) 2017-00441
CONTINUATION OF CERTAIN EXISTNG)
DEMAND-SIDE MANAGEMENT AND ENERGY-)
EFFICIENCY PROGRAMS)**

**SECOND SET OF DATA REQUESTS OF
METROPOLITAN HOUSING COALITION
TO LOUISVILLE GAS & ELECTRIC COMPANY**

Tom FitzGerald
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602
(502) 875-2428
FitzKRC@aol.com

Counsel for Intervenor
Metropolitan Housing Coalition

Dated: February 21, 2018

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to

provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company" or "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Metropolitan Housing Coalition. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are

requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

SECOND SET OF DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS AND ELECTRIC COMPANY BY METROPOLITAN HOUSING COALITION

Question 2-1

Please explain whether and how LG&E includes the following factors in conducting a cost-benefit analysis of individual demand-side management (DSM) or energy efficiency (EE) programs:

- a. The avoided costs of installation of controls or other utility system costs necessary to comply with limits on emissions, discharges, or management of wastes associated with generation of electricity.
- b. The avoided health impacts and associated economic costs of exposure to pollutants generated from combustion of fossil fuels to generate electricity.

Question 2-2

Please explain whether in assessing the benefits of energy efficiency LG&E included the avoided environmental compliance costs which are utility system costs in the Participant test, the total resource cost test and the Utility test. If so, please provide the value assigned to the avoided costs.

Question 2-3

Please explain whether the calculated benefit of energy efficiency would increase if LG&E included program participant non-energy benefits (NEBS) in their cost benefit analysis for both the Participant and the TRC tests?

Question 2-4

- a. In assessing the benefits of energy efficiency and of DSM programs, did LG&E include the avoided costs of complying with current and future environmental regulations addressing greenhouse gas (GHG) emissions?
- b. If so, please indicate the value accorded such benefit, and the basis for that valuation.

c. Please provide the value or values that LG&E has assigned to the cost of compliance with current and future greenhouse gas (GHG) emission regulations, in any regulatory filing before the Commission since 2010.

Question 2-5

a. Did LG&E use future CO2 costs in case 2014-00002, specifically a CO2 price in six of the twelve scenarios used in evaluating options?

b. Please explain the source for any carbon prices used by LG&E in that proceeding, and the price values assumed in 2020, 2030, and 2040?

Question 2-6

Focusing on the Utility Cost test, RIM test and TRC test, were the following factors considered in determining the costs or savings to the utility and its ratepayers, and including impacts associated with financial accounting, customer service and public safety:

- a) Improvement in water quality due to avoided discharge of pollutants;
- b) Avoided costs of pollution control equipment installation and maintenance;
- c) Avoided costs of equipment repair and replacement;
- d) Reduction in morbidity and mortality from pulmonary and respiratory illness due to reduced emissions of fine particulates;
- e) Reduction in ground-level ozone exceedances due to lower emissions of ozone precursors;
- f) Improvement in workplace productivity attributable to reductions of pollutants associated with electricity generation;
- h) Improvement in classroom productivity attributable to reductions of pollutants associated with electricity generation;

Question 2-7

If the answer to Question 2-6 is "yes," please describe the value assigned to each factor considered in determining costs and benefits of individual EE and DSM programs, and the basis for the assigned value.

Question 2-8

Does LG&E have access to GIS mapping?

Question 2-9

Please provide, by census tract, the average yearly bill per customer. If LG&E does not maintain that information by census tract, please provide the information based on the smallest congregate geographic area that LG&E uses or has used to provide the average yearly bill per customer.

Question 2-10

With respect to LG&E's assessment of the cost and benefit of the current EE and DSM programs, and the decision to curtail, continue, or eliminate individual EE or DSM programs for residential customers:

- a. What is LG&E's definition of "cost-effective"?
- b. Which model or models were used by LG&E to assess the cost effectiveness of its DSM programs, and why was that model or models chosen?
- c. Please identify and provide the results of any model or models that were used to measure the cost-effectiveness of the individual EE and DSM programs other than those submitted with the application, and provide a comparison of the results of the computations under those models to the modeling results presented in the filing.
- d. Did LG&E use the Societal Cost Test in any modeling, and if so, please provide the results of that assessment.
- e. Has LG&E reviewed the recommendations within the report, "Energy Efficiency Cost-Effectiveness Screening," published by the Regulatory Assistance Program in November 2012? If so, has LG&E followed its recommendations?
- f. Has LG&E reviewed the recommendations within the report, "National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources," published by the National Efficiency Screening Project in May, 2017? If so, has LG&E responded to and incorporated those recommendations in conducting the cost-effectiveness assessments for this filing?

- g. Was the model used to determine cost-benefit for various DSM measures the California Standard Practice Model?
- h. Was this the California Standard Practice Model referred to in the 1997 Public Service Commission case, 1997-00083?
- i. What version of the California Standard Practice Model was utilized, and when was the model last updated?
- j. Please explain the basis for choosing to use the California Standard Practice Model in assessing costs and benefits of various DSM measures.
- k. Did LG&E use the Avoided Cost Model of 2017 used by the California Public Utilities Commission?
- l. Did LG&E use the Demand Response currently in use in California, which includes "avoiding the consumption of fossil fuels which can damage the environment"?
- m. Did LG&E use all the expanded externalities of the 2001 update of the California Standard Practice Model in the area of Total Resource Cost Test?
- n. Did LG&E use a "Societal Test as described in the updated California Standard Practice Manual. If not, explain why not.
- o. If so, what is the difference from the Total Resource Cost Test perspective.
- p. Did LG&E include a definition of self-generation as a type of "demand-side activity" as stated in the 2001 California Standard Practice Model. If so, what was that definition.
- q. Please explain the factors that have caused LG&E to recommend changes in the current DSM programs from those approved in the last DSM filing.

Respectfully submitted,

A handwritten signature in black ink, consisting of a stylized, cursive script that is difficult to decipher but appears to be a personal name.

Tom FitzGerald
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602
(502) 875-2428
FitzKRC@aol.com

*Counsel for Intervenor Metropolitan
Housing Coalition*

CERTIFICATE OF SERVICE

This is to certify that electronic version of the Second Set of Data Requests of Metropolitan Housing Coalition to Louisville Gas and Electric Company 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 21, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six (6) copies in paper medium of the Second Set of Data Requests of Metropolitan Housing Coalition to Louisville Gas and Electric Company will be filed with the Commission within two business days of February 21, 2018.



Tom FitzGerald