

**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 EXISTING)
DEMAND-SIDE MANAGEMENT AND ENERGY-)
EFFICIENCY PROGRAMS)**

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

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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.

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

Question 1-1

With respect to LG&E's assessment of the cost and benefit of the current DSM programs, and the decision to curtail, continue, or eliminate individual 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. Did LG&E use the Societal Cost Test?
- d. 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?
- e. 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 those recommendations in conducting its cost-effectiveness assessments for this filing?
- f. Please identify any other models that were used by LG&E in computing cost effectiveness of DSM programs, and compare the results of the computations under those models to the results presented in the 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. Please identify any other models that have been used by LG&E in the past, or in preparation of this filing, to assess the costs and benefits of various DSM measures, and identify any such models and the results of those assessments.
- l. Did LG&E use the Avoided Cost Model of 2017 used by the California Public Utilities Commission?
- m. 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"?
- n. 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?
- o. Did LG&E use a "Societal Test as described in the updated California Standard Practice Manual. If not, explain why not.
- p. If so, what is the difference from the Total Resource Cost Test
- q. 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 is the definition.
- r. 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.

Question 1-2

In the Mr. Lawson testimony, it is stated that the Residential Refrigerator Removal Program is no longer cost-effective because of the declining age of the refrigerators.

- a. For the years 2014, 2015, 2016, and 2017, please identify the number of refrigerators using Freon, that were collected each year.

b. If known, please identify the volume of Freon that was drained and disposed of for each year.

c. If known, please describe the disposition of the collected Freon.

d. Please describe the consideration, if any, to the societal benefit of collecting and disposing, rather than venting to the atmosphere, that Freon.

e. Did LG&E receive payment for the Freon recovered from the old refrigerators, and for the scrap value of the refrigerators? If so, how much?

Question 1-3

With respect to the Customer Education and Public Information Program, the Lawson testimony was that the program will cease as a DSM measure but will be supported by LG&E. Will the costs associated with the program be recovered by ratepayers in a future rate case, or will shareholders assume responsibility for the costs?

Question 1-4

In determining the cost effectiveness of energy efficiency measures, did LG&E consider the The National Standard Practice Manual for Assessing Cost Effectiveness of Energy Efficient Resources, published by the National Efficiency Screening Project? If not, why not.

Question 1-5

The cost of retail power in Kentucky has grown approximately 6% annually for the last several years. Did LG&E incorporate those cost increases and trend in its assessment of DSM programs?

Question 1-6

In determining the costs and benefits of DSM and of energy-efficiency measures, did LG&E considered the benefit that such measures have in reducing greenhouse gas emissions? If not, why not, and if so, what value was assigned to the avoidance of emissions of greenhouse gases?

Question 1-7

In determining the costs and benefits of DSM and of energy-efficiency measures, did LG&E consider the benefit that such measures have in reducing morbidity and mortality associated with public exposure to particulate emissions? If not, why not, and if so, what value was assigned to the avoidance of emissions and to resulting reductions in pulmonary and respiratory morbidity and mortality?

Question 1-8

Please provide all documents, including cost-benefit studies, provided to the members of the LG&E DSM Advisory Group since the last DSM filing by LG&E.

Question 1-9

Were the requested changes in the DSM and EE programs in this filing vetted by the DSM Advisory Group, and were the changes supported by the individual members of the group, and by the group as a whole?

Question 1-10

Regarding the LG&E conclusion that its customers had adopted energy efficient measures sufficiently so as to render most of its DSM programs unnecessary, please provide all available data quantifying the percentage of LG&E residential and commercial customers have utilized:

- a. Energy Star-rated CFL or LED light bulbs
- b. Energy Star-rated refrigerators
- c. Energy Star-rated dishwashers
- d. Energy Star-rated washing machines
- e. Energy Star-rated clothes dryers
- f. Energy Star-rated furnaces
- g. Energy Star-rated air conditioners
- h. Energy Star-rated water heaters
- i. Power strips for entertainment and other “instant on” electronics?
- j. Attic insulation
- k. Rim-joist insulation
- l. Wall insulation

Question 1-11

To the extent that such data is available, please provide the breakdown of the data referenced in Q13 between owner-occupied residential ratepayers and renters?

Question 1-12

In determining the cost and benefit of the individual DSM and EE measures, did LG&E evaluate the degree to which the measures would be of value to those renting rather than owning their residences?

Question 1-13

What proportionality of power and gas use does LG&E assume the typical residential customer uses for plugged in versus space conditioning?

Question 1-14

What percentage of demand reduction did the average participant in the Residential Incentives Program achieve?

Question 1-15

Were the savings achieved via the Residential Incentives Program greater by plugged in savings or building envelope savings, and what were the relative savings achieved?

Question 1-16

Please explain the cost and benefits of providing Smart Energy Profiles on customers' bills, and the basis for the assumptions?

Question 1-17

Please explain why did LG&E cease printing the greenhouse-gas emissions of customers' power use on monthly bills?

Question 1-18

What consideration has LG&E given to restoring those greenhouse-gas emissions to monthly bills in lieu of Smart Energy Profiles, since it's a simple mathematical calculation ($2 \times \text{kWh}$)?

Question 1-19

Regarding the bases on which LG&E concluded its customers had adopted enough energy efficient measures, did LG&E consider plugged in purchases, such as appliances, building-envelope improvements, such

as weatherization and insulation or both? How does LG&E weigh the relative effectiveness of plugged in purchases versus building-envelope improvements?

Question 1-20

What percentage of the residential class have participated in LG&E's audit programs? Please provide the percentage by census block or zip code, and if know, by age of building and whether the building is owned-occupied or a rental unit.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that electronic version of the First 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 January 24, 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 First 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 January 24, 2018.



Tom FitzGerald