

**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)**

**METROPOLITAN HOUSING COALITION SUPPLEMENTAL DATA REQUEST TO
LOUISVILLE GAS AND ELECTRIC REGARDING REBUTTAL TESTIMONY**

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Metropolitan Housing Coalition

Dated: June 6, 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.

METROPOLITAN HOUSING COALITION SUPPLEMENTAL DATA REQUEST TO LOUISVILLE GAS AND ELECTRIC REGARDING REBUTTAL TESTIMONY

Question 3-1 Concerning the rebuttal testimony of Gregory Lawson, is LG&E aware of the Non-Energy Benefits analyses used in Iowa, Colorado, Oregon, Washington, Vermont, New York, Washington, Utah, Wyoming, New Hampshire, Connecticut, California, Idaho, Rhode Island and the District of Columbia?

Question 3-2 Please identify the statute, regulation, judicial decision or Commission decision that would prevent the Kentucky Public Service Commission from including use of a non-energy benefit analysis such as those used by the jurisdictions identified in Question 3-1, in determining the costs and benefits of DSM and EE programs?

Question 3-3 Does LG&E participate in the Plant for Plant effort specifically referencing the United Nations Environment Program (UNEP) to plant trees around the world?

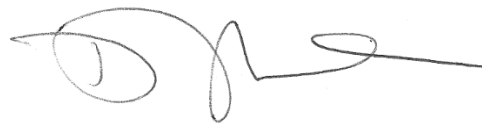
Questions 3-4 Did LG&E read the history of the UNEP to know that this program arose from a concern for the ill effects of global climate change?

Question 3-5 Did LG&E explore a Demand Side Program that would include planting trees? If so please provide any analysis of such a program component.

Question 3-6 Is LG&E aware that the case cited on page 10, footnote 11, was in reference to the ability of a party to intervene and had nothing to do with setting boundaries of what can be in a test for cost/benefit analysis?

Question 3-7 Does LG&E contend that Public Service Commission is without power to determine the cost/benefit of a DSM program and to decide whether and to what extent that cost can be recovered from the ratepayer?

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tom FitzGerald', with a long horizontal line extending to the right.

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CERTIFICATE OF SERVICE

This is to certify that electronic version of the METROPOLITAN HOUSING COALITION SUPPLEMENTAL DATA REQUEST TO LOUISVILLE GAS AND ELECTRIC REGARDING REBUTTAL TESTIMONY 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 June 6, 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 METROPOLITAN HOUSING COALITION SUPPLEMENTAL DATA REQUEST TO LOUISVILLE GAS AND ELECTRIC REGARDING REBUTTAL TESTIMONY will be filed with the Commission within two business days of June 6, 2018.



Tom FitzGerald