

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY TO FILE) CASE NO. 2007-00564
DEPRECIATION STUDY)

APPLICATION OF LOUISVILLE GAS)
AND ELECTRIC COMPANY FOR) CASE NO. 2008-00252
AN ADJUSTMENT OF ITS ELECTRIC)
AND GAS BASE RATES)

FIRST DATA REQUEST OF COMMISSION STAFF
TO ASSOCIATION OF COMMUNITY MINISTRIES AND
PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM

Association of Community Ministries and People Organized and Working for Energy Reform ("ACM/POWER"), pursuant to 807 KAR 5:001, are to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due not later than December 3, 2008. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

ACM/POWER shall make timely amendment to any prior responses if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which ACM/POWER fail or refuse to furnish all or part of the requested information, they shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 4 of the Testimony of Marlon Cummings ("Cummings Testimony"). Mr. Cummings states that the eligibility requirement for receiving service from an ACM member agency is for a household to be under threat of disconnection and living within the service area of a particular ministry.

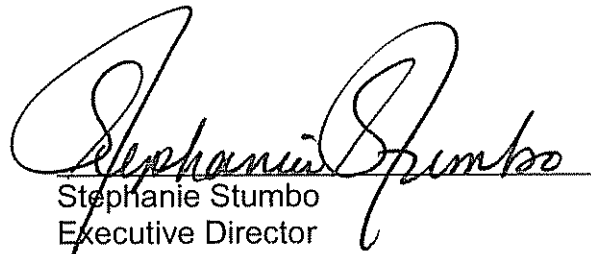
a. Does ACM use any income qualifiers for its programs, such as household income being at a certain percentage of the federal poverty level or a household being eligible to receive service under programs such as the Low Income Home Energy Assistance Program ("LIHEAP")?

b. If available, provide the number and/or percentage of recipients of ACM services who qualify for other assistance programs such as LIHEAP and Louisville Gas and Electric Company's ("LG&E") Home Energy Assistance program.

2. Refer to page 6 of the Cummings Testimony, specifically the question and response beginning at line 15 and ending at line 21.

a. Mr. Cummings states that low-income customers' utility costs are greater than those of other customers because their housing has inadequate insulation and/or heating equipment, which implies that their usage of natural gas or electricity is greater than that of other customers. Provide the usage data available to ACM which demonstrates that low-income customers' natural gas or electricity usage is greater than the usage of other customers.

b. Mr. Cummings states that in the service territory of Jeffersontown Area Ministries, Inc. ("JAM"), the majority of JAM clients are elderly and disabled and do not have the ability to perform energy conservation. Explain whether ACM is familiar with the weatherization services program operated by Community Action Kentucky, Inc. or the ratepayer-funded LG&E weatherization program available to low-income utility customers through LG&E's Commission-approved demand side management program.



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DATED November 14, 2008

cc: All Parties

Case No. 2007-00564
Case No. 2008-00252

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