

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 COMMUNITY ACTION KENTUCKY, INC.

Community Action Kentucky, Inc. ("CAK"), pursuant to 807 KAR 5:001, is 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.

CAK shall make timely amendment to any prior responses if it obtains 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 the CAK fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its 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. Page 2 of the Testimony of Thomas "Kip" Bowmar ("Bowmar Testimony") refers to the Low Income Home Energy Assistance Program ("LIHEAP") funds available and the households helped in Kentucky for the 2005-2006, 2006-2007, and 2007-2008 heating seasons, noting that the LIHEAP funding for the 2007-2008 heating season was much less than the two prior heating seasons.

a. Provide the amount of LIHEAP funds expected to be available to Kentucky for the 2008-2009 heating season.

b. Provide CAK's estimate of the number of households in Kentucky that will receive LIHEAP assistance in the 2008-2009 heating season.

2. Page 6 of the Bowmar Testimony indicates that the current 10 cents per meter Home Energy Assistance ("HEA") charge generates around \$1.3 million annually for Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company

("KU") on a combined basis and helps around 2,500 households. Mr. Bowmar states that increasing the HEA charge to 25 cents per meter would generate \$3.2 million annually and would help over 6,000 LG&E and KU households.

a. Provide a breakdown of the annual HEA funds of \$1.3 million which shows the amounts collected from LG&E customers and KU customers.

b. Provide an estimate of the average LG&E bill for the 2007-2008 heating season for a household eligible for the HEA program.

c. Explain how CAK determined that 6,000 is the appropriate number of customers to serve under its proposal to increase the HEA meter charge.

d. Mr. Bowmar states that the HEA program has been shown to reduce arrearages and shutoffs, thereby reducing the burden on ratepayers and shareholders. Provide any studies, papers, articles, etc. that demonstrate that the HEA program produces these results.


Stephanie Stumbo
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, Kentucky 40602

DATED November 14, 2008

cc: All Parties

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

Lonnie E. Bellar
Louisville Gas & Electric Company
220 West Main Street
PO Box 32010
Louisville, KY 40202

Honorable David C. Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Joe F. Childers
Getty & Childers
1900 Lexington Financial Center
250 West Main Street
Lexington, KY 40507

Honorable Dennis G. Howard II
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Honorable Lisa Kilkelly
Legal Aid Society
416 West Muhammad Ali Blvd
Suite 300
Louisville, KY 40202

Honorable Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

Lawrence W. Cook
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Honorable W. Duncan Crosby III
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202-2828

Honorable Allyson K. Sturgeon
E.ON U.S. Services, Inc
220 West Main Street
Louisville, KY 40202