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PUBLIC SERVICE  
COMMISSION

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 ) 2011-00134  
CONTINUATION OF EXISTING, AND ADDITION OF NEW )  
DEMAND-SIDE MANAGEMENT AND ENERGY- )  
EFFICIENCY PROGRAMS )

MOVANT FOR INTERVENTION METROPOLITAN HOUSING COALITION'S  
FIRST SET OF REQUESTS TO LOUISVILLE GAS AND ELECTRIC  
COMPANY AND KENTUCKY UTILITIES COMPANY FOR INFORMATION

Pursuant to the scheduling order adopted by the Commission in this case, Movant for Intervention Metropolitan Housing Coalition (MHC) requests that Louisville Gas and Electric Company (LGE) and Kentucky Utilities Company (KU) file with the Commission the following information, with a copy to all parties of record, within the time specified in the Commission's Order. For each response to request for information,

(1) Please identify the individual responsible for answering each request;

(2) These requests shall be deemed continuing so as to require further and supplemental responses if LGE or KU receives or generates additional information within the scope of these requests between the time of the response and the time of the hearing;

(3) A request to identify a document means to state the date or dates, author or originator, the subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian;

(4) To the extent that the specific document, study or information requested does not exist, but a similar document, study or information does exist, please provide the similar document, study or information;

(5) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self-evident to a person not familiar with the printout;

(6) If LGE and KU objects to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify MHC's Attorney of Record as soon as possible;

(7) For any document withheld on the basis of privilege, state the following: date; author; addressee; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted;

(8) In the event any document called for has been destroyed or transferred beyond the control of the company, please state the identity of the person by whom it was destroyed or transferred; the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy; and

(9) Where the information requested is the same as has been provided to another party in response to a request for information, it is sufficient to identify that response rather than duplicating the information requested.

**Request For Information 1**

For Jefferson County, Kentucky, please provide the amount of DSM fees billed for by census tract for the calendar years 2009 and 2010.

**Request for Information 2**

For Jefferson County, Kentucky, please provide the amount of DSM fees for all programs spent by census tract for calendar years 2009 and 2010.

**Request for Information 3**

What percent of each of the DSM programs is anticipated to be used for rental units?

**Request for Information 4**

What strategies for marketing DSM programs to low-income neighborhoods will be used?

**Request for Information 5**

What strategies will be used for marketing DSM programs to owners of rental units?

**Request for Information 6**

What is the plan for allowing non-profit housing development and rehabilitation organizations to participate in providing services under the We Care program or any of the other DSM programs?

**Request for Information 7**

Administrative costs for three proposed programs (which range from 19.9% to 30.1% of proposed seven-year program budgets) are very high in comparison to other administrative costs (which range from 3.1% to 8.5% of proposed seven-year program budgets). Please explain why the administrative costs are relatively higher and provide a breakdown of those cost components, and please provide an explanation for the 30.1% cost in the Residential Conservation /Home Energy Performance Program (item 3.0 in the filing).

**Request for Information 8**

Please explain the basis for the administrative costs of 24.12% for the Residential Incentive Program (item 7.0 in the filing).

**Request for Information 9**

Please explain the basis for the administrative costs of 19.9% in the Residential Refrigerator Removal Program (item 8.0 in the filing).

**Request for Information 10**

In addition to the administrative costs of each program, the filing includes a request for \$9.7 million for other administrative costs.

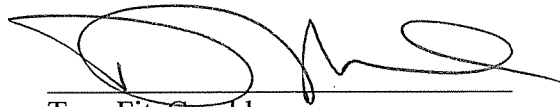
- (a) Since the entire We Care budget (with only a 5.1% administrative cost) is \$34 million, what are the expected deliverables of this \$9.7 million that will result in lowering usage?
- (b) How does that compare in effectiveness with using the same money for the We Care program?

(c) Since each component of the program has administrative costs assessed, what is the basis for the additional \$9.7 million requested for other administrative costs?

**Request for Information 11**

Please explain how community input is solicited of LG&E consumers in decisions on the rules and administration of the DSM programs, and how that input is considered and incorporated into the decisions?

Respectfully submitted,



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Counsel for Movant for Intervention  
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**CERTIFICATE OF SERVICE**

I certify that an original and ten (10) copies of this Motion of the Metropolitan Housing Coalition for Full Intervention were filed by priority mail to the Docket Clerk, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 and that a true and accurate copy of the foregoing was mailed via first class U.S. Mail, postage prepaid, this 1<sup>st</sup> day of June, 2011, to the following:

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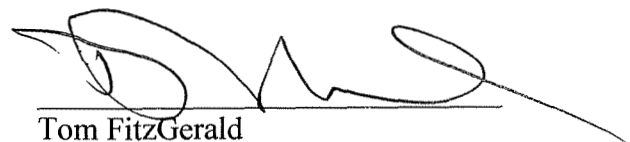
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