

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SANCTUARY CHURCH)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2018-00181
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO SANCTUARY CHURCH

Sanctuary Church, pursuant to 807 KAR 5:001, shall file with the Commission the original and five copies of the following information. The information requested herein is due no later than September 10, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. 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.

Sanctuary Church shall make timely amendment to any prior response 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 Sanctuary Church 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. When filing a paper containing personal information, Sanctuary Church shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Complaint, paragraph (c), regarding the use of the building located at 930 Mary Street, Louisville, Kentucky.

a. Explain in detail the use of the building as an “Artist Space” and as a “Charitable Social Service Office Space for multiple non-profit businesses.”

b. Regarding Sojourn Community Church’s use of the building, explain the nature and frequency of their use of the building.

c. Are there other organizations that utilize the building on a regular and frequent basis? If so, provide details of those organizations and the nature and frequency of their use of the building.

d. Explain whether Sanctuary Church charges these other entities for the use of the building. If so, provide the amount charged to each entity.

2. Provide a copy of any written correspondence or documentation between Sanctuary Church and LG&E related to the claims raised in the Complaint.

3. Refer to the Complaint, page 2.

a. Provide a copy of the energy audit performed by LG&E.

b. Provide the status of Sanctuary Church's decision to retrofit the electric blowers and hydronic pump motors with variable speed drives.

c. Provide the status of Sanctuary Church's decision to "install a thermostat to the main part of the building and replace the remaining ones throughout the building."

d. Explain the basis for the statement that "all of this retrofitting, replacement and conservation may still not reduce the 'peak demand spike' for this charitable institution."

4. Provide a general description of the activities that take place inside the building on a weekly basis during the months of May through December.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED **AUG 27 2018**

cc: Parties of Record

*Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Andre F Regard
Attorney at Law
269 W. Main Street, Suite 600
Lexington, KENTUCKY 40507

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010