

### Data Request

**Data Request No.** 26  
**Company Name** Kansas City Power & Light Company  
**Case/Tracking No.** ER-2006-0314  
**Date Requested** 8/4/2006  
**Requested From** KCPL  
**Requested By** Trigen-Kansas City Energy Corporation

**Description** Provide a listing of all Kansas City-based Great Plains Energy/Kansas City Power & Light company personnel and/or agents that are involved in marketing electric utility services in Kansas City, MO. Provide title, phone numbers and e-mail addresses for these individuals.

**Due Date** 8/24/2006

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**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Data Request

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<b>Case/Tracking No.</b>	ER-2006-0314
<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

**Description**                      The following pertains to the activities of KCPL's marketing group (i.e. the group that seeks to sell regulated KCPL products and services within KCPL's certificated Missouri territory).

- a) Are the activities of this group ratepayer-funded?
- b) Provide an estimate of the expense of efforts by this group (as well as expense of other departments or divisions within the Company allocated to downtown Kansas City, Missouri) specifically directed at moving existing and prospective customer load from alternative energy sources (e.g. Trigen district energy) onto the KCPL electric system.
- c) Please provide the last 5 years' actual historical and budgeted spending by this group and percentage that is funded by ratepayers.

**Due Date**                              8/24/2006

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## Data Request

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<b>Case/Tracking No.</b>	ER-2006-0314
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### **Description**

Reference the programs contained in the Company's "regulatory plan" in Case No. EO-2005-0329 and the direct testimony of Susan K. Nathan in this case, Case No. ER-2006-0314. Recognizing that elimination of electrical load through the use of alternative energy sources is different from curtailment per se, outright avoidance of low-load factor, high demand electrical usage nonetheless accomplishes the desired curtailment and is in fact preferable to costly and inconvenient efforts to perform spot curtailment. Consistent with this, the testimony and exhibits are replete with references to the need to reduce demand loading on the KCPL system. According to Ms. Nathan's testimony "it became apparent that KCP&L was not concerned about how the customer curtailed, *as long as they did curtail*" (Schedule SKN-1 to her testimony in ER-2006-0314; emphasis ours). It therefore follows that all reasonable means to pursue peak load demand reduction should be pursued.

In light of the above, the Company's recognition of the need to reduce demand load, and the ratepayer-funded initiatives to reduce system peak loading, answer the following:

- a) Confirm that electrical system peak load avoidance, such as can be realized by displacement to alternative energy sources, is at least as desirable as curtailment of load, if not better as a policy goal. If such cannot be confirmed, please state why not.
- b) Further, confirm that occasions of highest system electrical demand loading coincide with the most intensive use of commercial chilling equipment and associated HVAC equipment. If such cannot be confirmed, please state why not.
- c) Confirm also that KCPL stands behind Ms. Nathan's own testimony regarding the demand response initiatives and the need

to curtail HVAC loading, particularly the statement that "...it became apparent that KCP&L was not concerned about how the customer curtailed, *as long as they did curtail*" (Schedule SKN-1 to her testimony in ER-2006-0314; emphasis ours), and that migration of low-load factor, high demand load such as that presented by Bartle to the steam-driven alternative would be consistent with Ms. Nathan's testimony and the ratepayer-supported efforts to reduce peak system loading. If such cannot be confirmed, please state why not.

- d) Reconcile the contemporaneous marketing efforts by Great Plains Energy/Kansas City Power & Light employees to convince the City of Kansas City Missouri/Bartle Hall Convention Center to forgo/discontinue receiving heating steam and steam-driven chilled water service from Trigen and Trigen's chilled water service affiliate.
- e) State the number of megawatts by which such a decision by Bartle Hall, encouraged by KCPL, would increase KCPL's peak system demand load. Explain how the marketing group's ratepayer-funded efforts to effectively increase peak summertime loading on the system can coexist simultaneously with Ms. Nathan's ratepayer-funded efforts to reduce peak system loading.
- f) Explain how the Company's customer base is served by these actions.
- g) Explain the public policy interest served by the Company in this regard.
- h) Provide all communications, external and internal, related to KCPL's pursuit of the chilled water business at Bartle Hall. Include all notes, emails, internal studies and evaluations.

**Due Date**

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## Data Request

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<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

### **Description**

Concerning energy services at Kansas City, Missouri's ("KCMO") Bartle Hall, KCMO's rejection of KCPL's effort to convince the facility's managers to increase the amount of electrical demand and usage by following KCPL's recommendation to install electric chillers (to serve the base facility as well as the Bartle Expansion) will result in a demand response savings as referenced in data request 28(e).

With regard to Bartle's now-to-be realized electric savings, it appears that another KCPL ratepayer-funded demand response/efficiency program may now apply. Appendix C to the Regulatory Plan reads as follows: C&I Custom Rebate-Retrofit; Program Description; The C&I Custom Rebate Retrofit program will provide rebates to C&I *customers that install, replace or retrofit qualifying electric savings measures including HVAC systems*, motors, lighting, pumps, etc. (Appendix at C-6) (Emphasis ours)

- a) Confirm that installation and/or replacement/retrofit of electric-driven chilling equipment with steam-driven chilling equipment at the Bartle Hall facility results in electric savings through the avoidance of electricity necessary to produce chilling energy.
- b) Confirm that KCPL agrees that KCMO's decision not to follow KCPL's recommendation/proposal to install electric chillers in favor of steam-driven chillers results in substantial peak electric demand avoidance for the KCPL system.
- c) If not, state why and substantiate KCPL's reasons for disagreeing.
- d) Confirm that KCPL agrees that KCMO's ability to avoid those megawatts of system peak demand referenced in response to data request 28(e) is substantial, yields a benefit that is at least the equivalent of curtailment and serves the purposes that KCPL's

“Affordability, Efficiency and Demand Response Programs” seek to achieve.

- e) If not, state why and substantiate KCPL’s reasons for disagreeing.
- f) As KCMO’s rejection of KCPL’s Bartle chilling proposal results in substantial electricity demand response savings, confirm that KCMO/Bartle is eligible for a rebate under one or more of the ratepayer-funded programs introduced by KCPL in EO-2005-0329. Using the rationale specified in the program, demonstrate the dollar value of the rebate to which KCMO is entitled.
- g) If not, substantiate KCPL’s reasons for denial.
- h) Include KCPL’s evaluation of “societal benefit” as it specifically applies to Bartle’s avoidance of chilling electricity demand through the use of steam energy rather than electrical energy.

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## Data Request

<b>Data Request No.</b>	30
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<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
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**Description** In 2005, Ms. Nathan's group was actively providing testimony, evaluating and preparing proposals for ratepayer-funded demand response programs. Contemporaneously, KCPL's marketing group was preparing proposals and aggressively seeking to convince KCMO/Bartle Hall's managers to install electric-driven equipment at Bartle Hall as noted in the preceding DR's.

- a) Explain the business objectives/management principles/corporate philosophy that guide these simultaneous, dual-track efforts to both reduce and increase electric demand loading at the same time.
- b) At what executive/management level are these respective efforts approved?
- c) Name the executives/managers responsible for the respective efforts.
- d) Are the respective marketing and efficiency/demand response (Ms. Nathan's) groups comprised of the same personnel? If not, do the groups communicate with each other?

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## Data Request

<b>Data Request No.</b>	31
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<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

### **Description**

The following question relates to the Company's efforts to be selected to serve heating and cooling requirements at buildings both in existence and buildings under construction that have in place or are expected to opt for district heating and/or cooling service from Trigen or Trigen affiliates, instead of electric-driven self-production of heating and cooling using energy supplied by the Company.

In light of the Company's recognition of the need to reduce demand load, and the ratepayer-funded initiatives to reduce system peak loading, answer the following:

- a) Confirm that electrical system peak load avoidance, such as can be realized by buildings displacing peak demand load that would be posed by electric chillers, is at least as desirable as curtailment of electrical load, if not better as a policy goal.
- b) Further, confirm that occasions of highest system electrical demand loading coincide with the most intensive use of commercial electric chilling equipment and associated HVAC equipment such as that which would be employed by such customers/prospects if electrical equipment was selected to serve chilling requirements.
- c) Confirm that KCPL stands behind Ms. Nathan's own testimony regarding the demand response initiatives and the need to curtail HVAC loading, particularly the statement that "...it became apparent that KCP&L was not concerned about how the customer curtailed, *as long as they did curtail*" (Schedule SKN-1 to her testimony in ER-2006-0314; emphasis ours), and that migration of low-load

factor, high demand load such as that presented by such customers/prospects to the steam-driven alternative would be consistent with Ms. Nathan's testimony and the ratepayer-supported efforts to reduce peak system loading.

- d) In light of the demand response initiatives referred to in c) above, reconcile the contemporaneous marketing efforts by Great Plains Energy/Kansas City Power & Light employees to convince potential customers/prospects to forgo receiving heating steam and steam-driven chilled water service from Trigen and Trigen's chilled water service affiliate.
- e) List the customers and prospects that the Company has made efforts to contact (through any and all means of communication) with the intent to market, induce, convince or otherwise persuade to forgo district heating or cooling provided by Trigen or its affiliates in favor of self-production of heating or cooling utilizing energy supplied by the Company. Provide an estimate of the number of megawatts, (on an individual targeted-customer basis and in the aggregate), by which KCPL's peak system demand load would increase if any or all of these customers in fact did utilize electrical energy for space heating and cooling.
- f) Explain how the marketing group's ratepayer-funded efforts to effectively increase peak summertime loading on the system can coexist simultaneously with Ms. Nathan's ratepayer-funded efforts to reduce peak system loading.
- g) Explain how the Company's customer base is served by these actions aimed at increasing peak demand loading at the prospective Arena.
- h) Explain the public policy interest served by the Company in this regard.
- g) Provide all communications, external and internal, related to KCPL's pursuit of space heating and chilled water business from buildings currently taking or contemplating taking district heating and/or cooling service from Trigen or its affiliates. Include all notes, emails, internal studies and evaluations.

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<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

### **Description**

With regard to KCPL's marketing efforts in competition with Trigen or its affiliates:

- a) Since December 2000, have KCPL representatives actively contacted Trigen's district steam heating customers in the Downtown Loop for the purpose of causing those customers to disconnect from the steam loop and convert to electric heating service?
  - i. If the response to item (a) above is affirmative, please identify each customer of Trigen contacted by KCPL representatives since December 2000.
  - ii. Referring to item (a)(i) above, please identify each customer of Trigen that KCPL was successful in converting from steam heating to electric heating service.
  - iii. Referring to item (a)(ii) above, please provide a copy of all promotional marketing materials KCPL provided to each Trigen customer converted from steam heating to electric heating.
  - iv. Referring to item (a)(ii) above, please provide a copy of all email correspondence, letters, notes and other documents in the possession of KCPL or its representatives that serve to document KCPL's interaction with each converted customer.
  - v. Referring to item (a)(ii) above, please provide a copy of all analyses performed by, or for, KCPL and relied upon to determine

the best energy alternatives for each customer.

- b) Since December 2000, does KCPL believe that Trigen representatives have actively contacted KCPL's electric heating customers in the Downtown Loop for the purpose of causing those customers to disconnect from electric heating service and convert to district steam heating service?
  - i. If the response to item (b) above is affirmative, please identify each customer of KCPL that Trigen was successful in converting from electric heating to district steam heating service.
- c) Does KCPL, or an affiliate of KCPL, currently provide chilled water or other chilling service to customers in Trigen's certificated territory? If so, please explain the nature of such service and identify the customers so served by KCPL, or its affiliate.
- d) Does KCPL derive any regulated electric service revenues from customers that use said electric service to operate customer-owned chillers for cooling purposes? Please explain.
- e) Does KCPL derive any regulated electric service revenues from customers that use said electric service to operate chillers owned by KCPL, or a KCPL affiliate, for cooling purposes? Please explain.
- f) Referring to the responses to items (d) and (e) above, please provide an estimate of the portion of KCPL's revenues attributable to electricity used by its customers to cool facilities.

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<b>Requested By</b>	Trigen-Kansas City Energy Corporation

### **Description**

- a) In addition to those efforts discussed in DR's – above, has KCPL promoted, or does KCPL reasonably anticipate promoting, any media advertising campaigns or demand side management programs designed to encourage customers to conserve electricity by implementing measures to reduce consumption? Please explain.
- b) Please identify and describe the primary purpose(s) of any conservation efforts undertaken by KCPL (e.g., reduce summer peak usage, reduce winter peak usage, improve system or customer load factor, avoid or defer need for additional generation capacity to meet system peak load, etc.).
- c) Referring to item (a) above, please indicate when KCPL first began the referenced energy conservation activity.
- d) Have the costs associated of KCPL's energy conservation activity been included in and recovered through KCPL's current effective rates and tariffs? Please explain.
- e) Referring to items (a) and (d) above, has KCPL sought recovery of the cost of its energy conservation measures in the Company's pending rate case, Case No. ER-2006-0314? Please explain.
- f) Has KCPL set targets (in total kWh or kW demand) for reduced energy consumption resulting from the identified conservation efforts? Please explain.
- g) In general terms, is it the expectation of KCPL that it will recover through its regulated rates any lost margin that might result from decreased energy consumption due to

conservation initiatives, as well as the costs of the conservation program itself? Please explain.

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<b>Description</b>	<p>This request relates to the net efficiency of KCPL's generating assets:</p> <ul style="list-style-type: none"><li>a) Provide the thermal efficiency of KCPL's coal-fired and simple-cycle electric generating plants.</li><li>b) Provide the equipment ratings and production statistics of that part of KCPL's fossil fuel fleet which optimizes the combustion of fossil fuel resources by employing highly efficient cogeneration? What percentage of KCPL gross electric production is realized through cogeneration?</li><li>c) What percentage of KCPL's fossil-fuel fleet consists of conventional condensing steam-electric equipment?</li><li>d) What is the Net thermal efficiency of the coal-fired fleet? Unless defined otherwise by the Company, Net thermal efficiency is defined as usable heating value realized by the end user plus the thermal equivalent of electricity cogenerated divided by the heating value of the fuel input.</li><li>e) What is the Net thermal efficiency of the gas-fired fleet? What is the heat rate of the gas-fired fleet?</li><li>f) What is the Net thermal efficiency of the gas-fired fleet excluding Hawthorne Unit 6? What is the heat rate of the gas-fired fleet excluding Hawthorne Unit 6?</li><li>g) What percentage (MW simple-cycle/total gas-fired MW) of KCPL's gas generating fleet consists of simple-cycle peaking machines? What are the heat rates and thermal efficiencies of these machines in the aggregate?</li><li>h) Identify the peaking generating asset(s) in the KCPL fleet that is "last-on, first-off" in dispatch order during the Company's highest peak loading periods. Provide the fuel</li></ul>
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- type and heat rate of this machine. Provide the historical utilization factor (hours run time/year) of this machine(s).
- i) Using the utilization factor given in h) above, and recent historical and projected fuel prices to drive this machine(s), provide the cost per generated kW-hr of the electricity produced by this machine(s).
  - j) Correlate, in tabular form, the cost of the electricity produced in the machine(s) referred to in h) and i) above with the incremental electric revenue associated with the additional electric chilling peak-day consumption represented by those customers referred to in DR #31 e) above, if those customers were to forgo district cooling provided by Trigen's affiliate in favor of self-production utilizing energy provided by the Company.
  - k) To the extent that the tariff revenue yielded through customer kW-hr usage during electric system peak demand periods (as set forth in the Company's response to j) above) falls short of the actual cost to generate during such peak periods, identify how the earnings shortfall is recovered. Identify any subsidies between customers or classes of customers.
  - l) In the event the Company intends to substitute purchased power for the peaking asset(s) referred to in h) through j) above, identify the per kW-hr cost to the Company of this purchased power, ensuring that such cost projection (or firm pricing, if available) takes into consideration the fact that it would be purchased in the greatest quantities on occasions of highest regional/system electric peak demand.

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Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication in any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Kansas City Power & Light Company and its employees, contractors, agents or others employed by or acting in its behalf.

**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Data Request

<b>Data Request No.</b>	35
<b>Company Name</b>	Kansas City Power & Light Company
<b>Case/Tracking No.</b>	ER-2006-0314
<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

**Description**                      This request relates to carbon emissions:

- a)      What is the total carbon/greenhouse gas impact of the KCPL coal-fired generating fleet in tons CO<sub>2</sub> per year?
- b)      For that portion of KCPL's production generated in its coal fired plants, how many pounds of carbon dioxide are emitted per MW-hr of useful energy delivered to KCPL's ratepayers?
- c)      How many pounds of carbon dioxide are emitted by KCPL system-wide per MW-hr of useful energy delivered to KCPL's ratepayers?
- d)      In the context of KCPL electricity sold for the purpose of utilization in building space heating (by whatever means-electric resistant strip heaters, steam boilers, hot water boilers), provide the net thermal efficiency as a percentage. Net thermal efficiency is defined as usable heating value realized by the end user plus the thermal equivalent of electricity cogenerated divided by the heating value of the fuel input. Because all of KCPL's incremental winter space heating sales are produced by coal-fired units, assume coal is 100% of the fuel source.

**Due Date**                              8/24/2006

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**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_

### Data Request

**Data Request No.** 36  
**Company Name** Kansas City Power & Light Company  
**Case/Tracking No.** ER-2006-0314  
**Date Requested** 8/4/2006  
**Requested From** KCPL  
**Requested By** Trigen-Kansas City Energy Corporation

**Description** Does KCPL dispute that the use of alternative energy, specifically district energy, when employed in such a way to relieve peak system electrical demand serves the policy mandate of the need for reducing addition of the highest cost and least utilized electric production capacity on its system? Does KCPL believe that alternative energy sources such as district energy that enable electric system demand relief should be discouraged?

**Due Date** 8/24/2006

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**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_



## Data Request

<b>Data Request No.</b>	37
<b>Company Name</b>	Kansas City Power & Light Company
<b>Case/Tracking No.</b>	ER-2006-0314
<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

<b>Description</b>	<p>This request pertains to compensation/incentives for the Company's marketing employees:</p> <ul style="list-style-type: none"><li>a) Provide copies of compensation plans/programs for the Company's marketing employees.</li><li>b) Are marketing employees provided with extra remuneration or other cash or non-cash incentives over and above salary for signing new electrical customer/ratepayer load?</li><li>c) Is there extra compensation or any other special incentive(s) awarded to these employees for signing of customer load that is competitive (i.e. that portion of load that is not part of KCPL's uncontested monopoly service, specifically heating and cooling load that could be provided by Trigen or its affiliates)?</li><li>d) If so, disclose the nature and value of these incentives.</li></ul>
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<b>Due Date</b>	8/24/2006
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**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Data Request

<b>Data Request No.</b>	38
<b>Company Name</b>	Kansas City Power & Light Company
<b>Case/Tracking No.</b>	ER-2006-0314
<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

<b>Description</b>	This request pertains to the Company's activities concerning energy services to the Truman Medical Center ("Truman"):
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- a) Testimony presented in Trigen's certificate case (HA-2006-0294) established that steam produced for Truman by electrical energy supplied by the Company would be significantly more costly than steam energy provided by Trigen to Truman. Testimony offered by the Company posited that on the contrary, "...KCPL is capable of providing economic electric service to generate steam heat to Truman Medical Center ("TMC")." (Direct testimony of David L. Wagner; Case No. HA-2006-0294 page 2 at lines 9-10). Soon after this filing, and before any evidence was offered by the Company to substantiate Mr. Wagner's claim, the Company withdrew from the case.
  - i. Please detail the assumptions, calculations, evaluations and analyses to substantiate Mr. Wagner's assertion regarding the economic viability of the Company providing electric service to produce steam heat for TMC.
  - ii. Provide the net thermal efficiency that would prospectively be realized by steam heat delivered through use of the Company's electric service, and the prospective quantities of CO<sub>2</sub> produced in the Company's electric generating plants per mlb of steam delivered to TMC.
- b) Provide all notes, internal and external communications, evaluations, analyses, etc... related to (a) above.

**Due Date**

8/24/2006

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**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_

### Data Request

<b>Data Request No.</b>	39
<b>Company Name</b>	Kansas City Power & Light Company
<b>Case/Tracking No.</b>	ER-2006-0314
<b>Date Requested</b>	8/4/2006
<b>Requested From</b>	KCPL
<b>Requested By</b>	Trigen-Kansas City Energy Corporation

### **Description**

This request pertains to charitable donations made by KCPL.

- a) Provide a listing of charitable donations made by KCPL that were in the form of a single gift in excess of \$1 million to all organizations throughout KCPL's entire service territory. State the geographical location of the headquarters and/or principal facilities of such charitable donation recipients, and whether these facilities are within or adjacent to Trigen's certificated service territory. Limit the listing to charitable organizations that own, operate or are building facilities with significant heating and cooling loads, and which have alternative energy providers that are competitive with the Company for providing such heating and cooling services. Provide figures in millions of dollars, and list all gifts donated and/or pledged in the past year only.
- b) Is the Company seeking recovery of part or all of the funds for charitable donations from regulated ratepayers? Has the Company included such requests as part of this rate case, and if not, does the Company plan to do so? If yes, what portion of donation amount does the Company expect to recover from its regulated rate revenue?
- c) With regard to the bestowing of such charitable gifts, demonstrate how the Company complies with the Commission's Promotional Practices Rule and provide all documentation demonstrating such compliance.

**Due Date**

8/24/2006

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**Response Provided By:** \_\_\_\_\_

**Date:** \_\_\_\_\_