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**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

**PUBLIC SERVICE
COMMISSION**

In The Matter Of:

**AN ADJUSTMENT OF THE GAS AND ELECTRIC)
RATES, TERMS AND CONDITIONS OF) CASE NO.
LOUISVILLE GAS AND ELECTRIC COMPANY) 2003-00433**

**SUPPLEMENTAL DATA REQUEST OF
METRO HUMAN NEEDS ALLIANCE (MHNA)
AND PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM
(POWER) TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Come Metro Human Needs Alliance ("MHNA") and People Organized and Working for Energy Reform ("POWER"), by counsel, and request the response of Louisville Gas and Electric Company ("LG&E") to the following Requests for Information.

GENERAL INSTRUCTIONS

As used herein "documents" refers to every writing or written record of every description that is, or has been in the possession, control or custody of LG&E or its agents or of which LG&E has knowledge including without limitation, correspondence, books, journals, memoranda, notes, studies, pamphlets, maps, drawings, pictures, recordings video tapes, reports, surveys, statistical computations, financial records, computer or electronic data or any copy of such writing or such record when the original is not in the possession, custody or control of LG&E or its agents and every such record where such copy is not an identical copy of the original.

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) These requests shall be deemed continuing so as to require supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing hereon.
- (3) If any request appears confusing, please request clarification directly from the undersigned.
- (4) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, 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 which would not be self evident to a person not familiar with the printout.

(6) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.

(7) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; 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, please provide identification of the document and 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.

(9) To the extent that a request calls for information not available for all categories or all periods of time, please explain why the information is not available and answer the request for the months or categories for which it is available.

REQUESTS FOR INFORMATION

1. Refer to Response to First Data Request of MHNA and POWER Dated February 3, 2004 (hereinafter referred to as "Response to MHNA and POWER") A-1. Please supply the actual figures utilized in your calculation to arrive at both the dollar figure increases and the percentage increases specified in MHNA and POWER First Data Request No. 1 and reproduce the actual calculations.
2. Refer to Response to MHNA and POWER A-2. Please supply the actual figures utilized in your calculation to arrive at both the dollar figure increases and the percentage increases specified in MHNA and POWER First Data Request No. 2 and reproduce the actual calculations.
3. Refer to Response to MHNA and POWER A-3(a).
 - a) Please explain in detail what you mean by "as billed" calculations.
 - b) Please explain in detail what you mean by "unbilled revenues."
 - c) Please describe where the "monthly financial statements" referred to in your answer can be found.
4. Refer to Attachment to MHNA and POWER Question No. 3(a).

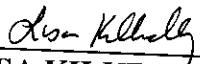
- a) Please explain in detail what information you utilized in obtaining the average Mcf and Average bill figures and where this information is located.
 - b) Does the Average Bill figure supplied include any amounts other than gas cost? If so, please describe other amounts included.
 - c) For the January 2003 figures supplied, please supply the actual figures utilized in your calculations for Average Mcf and Average bill and reproduce your actual calculations.
5. Refer to Attachment to MHNA and POWER Question No. 3(b), page 1 of 1.
- a) Please explain in detail what information you utilized in obtaining the average Mcf and Average bill figures and where this information is located.
 - b) If the process described in 4a and 5a above differed in any way, please describe in detail how those processes, information used or calculations differed.
 - c) For the Avg. Mcf for each month of 2003, state the percentage increase and dollar figure increase for each month and usage shown that the proposed rates would generate.
 - i) at the gas prices in effect for each month in 2003 (state the price)
 - ii) at the current gas price (state the price)
 - d) In generating the figures for 5c above, please provide the figures utilized and reproduce the calculations utilized in determining these amounts.
 - e) Do you have any information or explanation as to why average gas usage as shown on Attachments to MHNA and POWER Question No. 3(a) and 3(b) is lower for LIHEAP users than for residential customers in general?
6. Refer to Response to MHNA and POWER A-4
- a) Please describe where the "monthly financial statements" referred to in your answer can be found.
7. Refer to Attachment to MHNA and POWER Question No. 4(a).
- a) Please explain in detail what information you utilized in obtaining the average Kwh and Average bill figures and where this information is located.
 - b) Does the Average Bill figure supplied include any amounts other than Kwh cost? If so, please describe other amounts included.

- c) For the January 2003 figures supplied, please supply the actual figures utilized in your calculations for Average Kwh and Average bill and reproduce your actual calculations.
8. Refer to Attachment to MHNA and POWER Question No. 4(b).
- a) Please explain in detail what information you utilized in obtaining the average Kwh and Average bill figures and where this information is located.
- b) If the process described in 7a and 8a above differed in any way, please describe in detail how those processes, information used or calculations differed.
- c) For the Avg. Kwh for each month of 2003, state the percentage increase and dollar figure increase for each month and usage shown that the proposed rates would generate.
- d) In generating the figures for 8c above, please provide the figures utilized and reproduce the calculations utilized in determining these amounts.
- e) Do you have any information as to why average electric usage for LIHEAP users is lower than for residential customers in general?
9. Refer to Response to MHNA and POWER A-9c
- a) Please describe in detail how these figures were derived.
- b) Why does the entry for January 2003 in the disconnect expense column show a negative number? Please provide a complete explanation.
10. Refer to Response to MHNA and POWER A-9h
- a) Please explain any reasons and possible explanations for the increase in disconnections and reconnections in 2002 as compared with 2001.
11. Refer to Attachment to MHNA and POWER Question No. 9(i).
- a) To which zip codes does page 3 of 4 refer?
- b) To which zip codes does page 4 of 4 refer?
- c) Can LG&E produce this information per census tract? If so, please provide.
- d) Can LG&E provide this information by any other demographic or geographic breakdown? If so, please describe and state whether LG&E would be willing to provide this information.

- e) Do the zip codes listed comprise LG&E's entire service area? If not please explain.
 - f) For the years 2001, 2002 and 2003 please state the average number of LG&E customers by zip code.
12. Refer to Response to MHNA and POWER A-11(e), Page 3 of 4.
- a) Please break down the number of deposits required by month by zip code utilizing a similar format to the Response to Question 9(i).
13. Refer to Response to MHNA and POWER A-11(h)
- a) The original data request asked LG&E to identify and provide copies of all policies guidelines and other documents relating to LG&E's decision as to whether to allow a customer to pay a deposit in installments. Please do so, rather than simply describing the policy.
14. Refer to Response to MHNA and POWER A-11(i)
- a) Please identify the third party consumer credit reporting agency referred to in the response.
 - b) Please describe the complete process LG&E goes through in determining whether to require a deposit, including what determinations are made by LG&E and what role the third party consumer credit reporting agency plays.
 - c) Describe in detail the credit scoring technique and provide all written documents pertaining to this. Describe all categories of information examined and how different factors are scored.
 - d) As requested in the original data request identify and provide copies of all policies, guidelines and other documents relating to LG&E's decision as to whether to require a customer to pay a deposit.
15. Refer to Response to MHNA and POWER A-18(d)
- a) Please describe in detail the Customer life cycle scoring model referred to in the response including the purpose of this initiative and the benefits to be derived.
16. Refer to Attachment to MHNA and POWER Question No. 18(e)
- a) Provide copies of all training materials used at the "New Credit Guidelines-LG&E" training referred to throughout this attachment. See, e.g. page 10 of 44.

- b) Provide copies of all training materials used at the "High Bill Refresher Training" referred to throughout the attachment, see, e.g. page 15 of 44.
17. Refer to Response to MHNA and POWER A-21.
- a) Please perform this analysis and supply the actual figures utilized in your calculation and reproduce the actual calculations.
18. Refer to Response to MHNA and POWER A-22.
- a) Please perform this analysis and supply the actual figures utilized in your calculation and reproduce the actual calculations.
19. Refer to Response to MHNA and POWER A-23.
- a) Please perform this analysis and supply the actual figures utilized in your calculation and reproduce the actual calculations.
20. Refer to Response to MHNA and POWER A-24.
- a) Please perform this analysis and supply the actual figures utilized in your calculation and reproduce the actual calculations.
21. Refer to Response to First Data Request of KACA A-4(4)
- a) Describe in detail the modification to the CIS system for "Home Energy Assistance (HEA) via DSM Factor" including the status of this initiative and whether it is complete. If complete include the date of completion.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Supplemental Data Request of Metro Human Needs Alliance and People Organized and Working for Energy Reform was served on the following persons on the 1st day of March, 2004, United States mail, postage prepaid.

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