Steven L. Beshear Governor

Robert D. Vance, Secretary Environmental and Public Protection Cabinet

Timothy J. LeDonne Commissioner Department of Public Protection



Commonwealth of Kentucky

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Mark David Goss Chairman

> John W. Clay Vice Chairman

Caroline Pitt Clark Commissioner

January 17, 2008

TO: PARTIES OF RECORD RE: Case No. 2007-00410

Louisville Gas and Electric Company

Enclosed is a memorandum that has been filed in the record of the above-referenced case. Any comments regarding the content of this memorandum should be submitted to the Commission within five days of receipt of this letter. Questions regarding this memorandum should be directed to Chris Whelan at (502) 564-3940, Extension 233.

Sincerely

Beth O'Donnell Executive Director

Enclosure



INTRA-AGENCY MEMORANDUM

KENTUCKY PUBLIC SERVICE COMMISSION

TO:

File

FROM:

Chris Whelan, Team Leader

DATE:

January 17, 2008

RE:

Case No. 2007-00410 - Revised Collection Cycle for Payment of Bills

On January 15, 2008, Commission Staff held an informal conference ("IC") with Louisville Gas and Electric Company ("LG&E") and the Attorney General ("AG"). The purpose of the conference was to discuss LG&E's motions to reconsider and modify the Commission's December 18, 2007 Order denying LG&E's request to reduce its bill payment period from fifteen days to ten days. LG&E requested the conference and Staff issued notice of the IC on January 11, 2008.

LG&E began the conference with a brief overview of its application and a discussion of its payment processing and the customer care system under development. To assist with its presentation, LG&E provided handouts for all participants. A copy of the handout is attached hereto.

LG&E stated that prior to outsourcing its payment processing to Atlanta, the company picked up mail once a day and processed payments 5 days a week, 8 hours a day. With its recent outsourcing to an Atlanta company, there are six mail pickups a day and payments are processed 7 days a week, 24 hours a day. LG&E stated that although payments take almost a full day longer to reach Atlanta than when mailed to a Louisville address, the extra mailing time is somewhat mitigated because of the new additional pickups and extended processing hours which should speed up the overall processing time.

The parties discussed their interpretation of the term "fully unified" customer care system as used in the Commission's December 18, 2007 Order. LG&E interpreted "fully unified" to mean identical rates, tariff structure, and policies and procedures. Commission Staff interpreted it to mean the same collection cycle and late payment policy. LG&E stated that it received approximately \$4 million in late payment fees in the last twelve months and neither it nor Kentucky Utilities ("KU") could make a change to its late payment policy outside of a general rate case because doing so would have a revenue impact. LG&E said it would consider unifying its late payment policies with those of KU in their next general rate cases which were expected to be filed sometime in 2008.

Case No. 2007-00410 Memo January 17, 2008 Page 2

The parties discussed LG&E's behavioral scoring system which assigns an internal credit score based on customer payment patterns. Staff expressed some concern that a customer's internal credit score would be negatively affected when, under LG&E's proposal, payments are received and posted by LG&E between the 10th and 15th day from the date of rendition of the bill. LG&E was asked if it would be possible, under the new customer care system, to use only payments made after the 15th day as being late for purposes of the internal credit score (i.e., there would be no negative effect on the customer's internal credit score for payments made during the 5 day grace period prior to the assessment of a late payment fee). LG&E said it would provide an answer as soon as possible.

Staff asked LG&E about a statement made on pages 4 and 5 of its January 10, 2008 filing. In that filing, LG&E stated that synchronizing its bill due date with KU would not affect "when LG&E may disconnect a customer for non-payment". LG&E clarified that, under its proposal, customers would be subject to disconnection 5 days earlier than they are currently but that the disconnection would occur at least twenty-seven days after the billing date as required by Commission Regulation.

cc: Parties of Record

Attachments: Sign-In Sheet

LG&E Handout (Main Case File only)

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: APPLICATION OF LOUISVILLE GAS CASE NO. 2007-00410 AND ELECTRIC COMPANY FOR APPROVAL OF A REVISED COLLECTION CYCLE FOR PAYMENT OF BILLS January 15, 2008 Informal Conference Please sign in: NAME REPRESENTING PSC-CEGAL PSC-FA PSC E.ON PSC-FA 046 E.ON U.S. SKO for EONUS 340 for EON 05. PSC-Electric Branch

Informal Conference: Case No. 2007-00410 Application for Revised Collection Cycle for Payment of Bills

January 15, 2008.

Purpose of Application

- Avoids unnecessary customer confusion
- receives next bill while complying with PSC regulation that no account should be disconnected prior to 27 days from bill date Allows completion of entire collection cycle before customer
- Improve our Customer Service Representatives ability to respond to
- Harmonizes the collection process of both utilities
- No change in when late payment fee applied

Payment Processing



Payment Processing

- Phoenix-Hecht Results indicate less than one day difference in mailing time: 2.79 vs. 1.96
- Increase in mailing time offset by:
- Six mail pick-ups daily vs. one mail pick-up
- Payments processed 24 hrs/day vs. 8 hrs/day
- Payments processed 7 days a week vs. 5 days a week
- Customers choosing to remit via electronic payment
- Mailed payments declining since 2003
- 43% of bill payments by mail in 2007 vs. 56% in 2003
- Analysis determined prudent to outsource remittance
- Poor investment due to declining volumes
- Provides five payment processing sites across U.S. for disaster recovery

Customer Care Solution (CCS)

Description of current system

- KU CIS deployed in 1987, uses an IMS database
- LG&E CIS deployed in 1993, uses a DB2 database
- Average age of CIS systems at investor owned utilities 9 years⁽¹⁾
- E.ON U.S. has seven billing systems not fully integrated, no single source of billing information
 - LG&E CIS KU CIS
- **Summary Billing**
 - Non-Regulated
 - Oracle Sundry
- Damage Tracking System
- 300 interfaces between disparate systems supporting the Retail

Scope of project

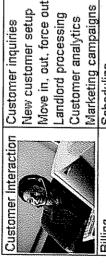
- Implementation of Customer Care Solution (CCS)
- Customer utility and miscellaneous billing
- Revenue accounting, credit and collections
- Customer interaction and relationship management
- Service order and meter management
- Electronic Data Management (EDM) allows for real time pricing
- Ancillary Systems/Scope
- Business Intelligence/Warehouse for reporting
- Enterprise Portal for user access
- Replacement of Mobile Dispatch and Scheduling For Customer Service Field Personnel
- Upgrade/replacement of related systems

Temporary supply / builders Trouble / Outage (with TOE)

New connections

JOH MOS.

Overview of Processes



New customer setup Customer inquiries

andlord processing Customer analytics

Marketing campaigns Scheduling

Regional structure

Meter reading orders down- & uploads Consumption estimation

Weter read corrections

Billing

Budget billing

Street lighting, unmetered supply nvoicing

Faxes

Billing and invoicing simulations Billing and invoicing exceptions Collective invoicing

Non-energy billing

Bill inserts / messages Reversals

Business Intelligence Reporting



Automatic bank draft enrollment/de-enrollment Service order dispatch, monitor, completion Collection agencies, bankruptcy, write-offs Self service web service requests Self service web account display Month-end, year-end processing Device inspections / certification Self service IVR - interfacing Returned payment items Appointment scheduling Self service ePayment Process payments Late payment fees Payment deferrals Unclaimed monies Installment plans Unbilled revenues Self service eBill Social programs Payment errors Device lifecycle Credit score GL posting Dunning Deposits Refunds Service orders Finance

CON U.S.

Primary Systems Being Replaced or Upgraded

Existing System

Replaced:

Electronic Fund Transfer System LGE and KU CIS
Meter Device Inventory System Meter Subsystem
Non-Regulated Billing (NRB)
SMILE
SSI - Cashier/Teller
Summary Billing
Customer Self Service (Internet)
Itron Integrator
Auto Dispatch

Upgraded:

Customer Complaint Tracking Code1 Doc1 Print (Enterprise Bill Print)

Primary Purpose/ Description for CCS

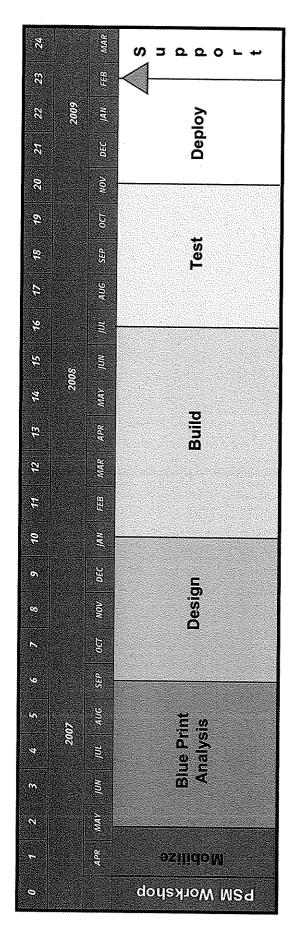
Daily sweep of local banks
Customer information system
Meter asset management
Entry of MV90 reads for KU CIS
Bill non-regulated items
CIS front-end for call center
Walk-in cashier system
Summary billing for customers
Customer internet site
Meter reading
Service Order schedule/dispatch/mobile

Track/collect customer complaints Address scrubbing Bill formatting

To-Be Application Architecture

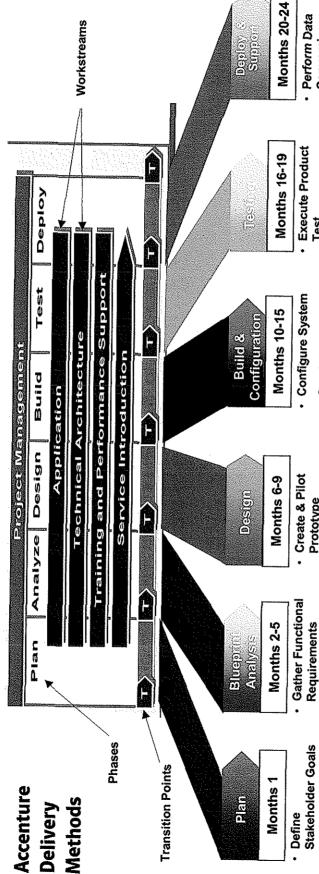


Project Timeline



functionality going live at the same time in mid-February 2009. The planned CCS project spans a 22 month schedule, with all

Project Approach



- Prototype
- Configuration Specs Create Functional & Design & Build

Process Blueprint

Create Business

and Expectations Define High Level Perform Solution

Fit/Gap Analysis

Establish Project

Requirements

Assess Current

Capabilities

Design Operations & Development Environment Execution

Define Application

Architecture & Technical

Define Solution

Blueprint

Define Delivery

Strategy

· Plan Project

Install & Build Operations &

- Communications Analyze Training
- Design Training & Design To-Be Organization

Communications

Develop Training &

Environments

Environments

Execution

Communications

Materials

- Execute User Test · Perform Mock Conversions

Build, Component

Create Technical

Specifications

& Assembly Test

RICEFS

Deploy Applications to

Production

Conversions

Pilot & Fine Tune

Application &

- & Performance Test **Execute Technical**
- Training Materials
- · Test & Pilot
- Launch Communications Conduct Training & Organization
 - Transition to Long-Term Operations
- Determine Organizational Readiness for Roll-Out