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PUBLIC SERVICE COMMISSION

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Executive Director

September 24, 2008

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Development Director

VIA HAND DELIVERY

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RE: In the Matter of:

Ronald Marstin
Managing Attorney
Utility Division

APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY TO FILE

DEPRECIATION STUDY, CASE NO. 2007-00564

AND

S. Stewart Pope
Advocacy Director

APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, INC. FOR AN

ADJUSTMENT OF ITS ELECTRIC AND GAS BASE RATES, CASE NO. 2008-00252

Robert Frederick Smith
Managing Attorney
Rural Division

Dear Ms. Stumbo:

Attorneys

Ando Beyers
Jeffrey S. Drexler
Lee D. Howies
Gwendolyn Horton
Lisa Kilkelly
Pat Moran
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Neva-Marie Pollex
Jeffrey B. Segal
Barbara A. Sullivan
Amy Kay Trainer
Rita J. Ward
Stephanie C. Willis
John Young

Enclosed for filing in the above-captioned case are an original and ten (10) copies of a Second Request for Information of Association of Community Ministries ("ACM") and People Organized and Working for Energy Reform ("POWER") to Louisville Gas and Electric Company.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self addressed stamped envelope.

Paralegals

Emily Brite
Roy Denny
Carol Dupin
Catherine M. Ford
Justin James
Virginia Jordan
Rachel Popham
Andrea Y. Robbins
MaryAnn Werling
Alberta H. White

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Lisa Kilkelly
Attorney for ACM and POWER

Cc: parties of record

Wyatt, Tarrant & Combs Fellow:
Shawna Scheidel

IOITA Fellows:
Nellie McCall
Betsy Jones



Metro United Way

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Second Request for Information of ACM and POWER was served on the following parties on the 24th day of September, 2008 by United States mail, postage prepaid.



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SEP 24 2008

**PUBLIC SERVICE
COMMISSION**

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

In The Matter Of:

APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY TO FILE)	CASE NO. 2007-00564
DEPRECIATION STUDY)	
)	
APPLICATION OF LOUISVILLE GAS)	
AND ELECTRIC COMPANY)	CASE NO. 2008-00252
FOR AN ADJUSTMENT OF ITS)	
ELECTRIC AND GAS BASE RATES)	

**SECOND REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES (ACM) AND PEOPLE ORGANIZED AND WORKING FOR
ENERGY REFORM (POWER) TO LOUISVILLE GAS AND ELECTRIC
COMPANY**

Association of Community Ministries ("ACM") and People Organized and Working for Energy Reform ("POWER"), by counsel, request the response of Louisville Gas and Electric Company ("LG&E") to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) 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.
- (4) 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.
- (5) 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.

(6) 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 time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please refer to LG&E's Response to the Association of Community Ministries ("ACM") and People Organized and Working for Energy Reform's ("POWER") First Request for Information dated August 27, 2008 (hereafter referred to as "Response to ACM and POWER") A-2.

a) Please list the agencies from whom LG&E received assistance payments on behalf of the customers described in A-2a and used by Mr. Seelye to calculate the average gas and electric usages for customers receiving LIHEAP assistance as stated in attachment to response A-2(f).

b) In part A-2(d), LG&E states that the list "includes" customers identified by community action councils and community action agencies that receive LIHEAP funds. Does the list entirely consist of these customers or does it include customers other than those identified in the response? If other customers are included, please describe such other customers.

2. Please refer to Response to ACM and POWER A-3.

a. Please provide the monthly number of residential electric and gas customers with arrearages and the average amount of arrearages for months from January 1, 2005 to June 30, 2008.

b. Please provide the monthly number of residential electric and gas customers for whom LG&E received assistance payments from community action councils or community action agencies as described in LG&E Response to ACM and POWER A-2(a) with arrearages and the average amount of arrearages for months from January 1, 2005 to June 30 2008.

3. Please refer to Response to ACM and POWER A-5.

a. State the monthly number of residential electric customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) from January 1, 2005 to June 30, 2008.

4. Please refer to Responses to ACM and POWER A-1, A-4 and A-6.

a. In Response to ACM and POWER A-1(b), Mr. Seelye provides monthly numbers of electric customers from May 2007 to April 2008 used in the requested calculation. These monthly numbers of customers agree with the monthly numbers of electric customers listed in Response A-4. Please confirm that these are the actual numbers of customers for the months listed. If not, please describe what these figures represent.

b. In Response to ACM and POWER A-1(c) Mr. Seelye provides the monthly numbers of gas customers from May 2007 to April 2008 used in the requested calculation. These monthly numbers of customers do not agree with the monthly numbers of gas customers listed in Response A-6. Please explain why the monthly numbers of gas customers listed in A-1(c) does not agree with the monthly number of gas customers in A- 6 and specifically explain what the figures in A-1(c) in the “Customers” column are and what the figures in attachment to A-6 are.

c. If not already provided in response A-1(c) or A-6, please provide the actual monthly number of gas customers for each question.

5. Please refer to Response to ACM and POWER A-7

a. State the monthly number of residential gas customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) from January 1, 2005 to June 30, 2008.

6. Please refer to Response to ACM and POWER A-9.

a. Please provide the monthly number of disconnections for nonpayment for electric customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) from January 1, 2005 to June 30, 2008.

7. Please refer to Response to ACM and POWER A-11

a. Please provide the monthly number of disconnections for nonpayment for gas customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) from January 1, 2005 to June 30, 2008.

8. Please refer to Response to ACM and POWER A-17

a. State the monthly number of disconnect/reconnect charges imposed on residential electric customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) from January 1, 2005 to June 30, 2008.

b. State the monthly number of disconnect/reconnect charges imposed on residential gas customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) from January 1, 2005 to June 30, 2008.

9. Please refer to Response to ACM and POWER A-18

a. State the number of meter test charges imposed on residential electric customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) for the test year and three preceding calendar years.

b. State the number of meter test charges imposed on residential gas customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) for the test year and three preceding calendar years.

10. Please refer to Response to ACM and POWER A-19

a. State the number of returned payment charges imposed upon electric and gas residential customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) for the test year and the three preceding calendar years.

11. Please refer to Response to ACM and POWER A-20

a. Please describe what is meant by the statement in A-20(a) "LG&E maintains deposits in total." Does this mean that the figures listed A-20(a) are the number of customers assessed a deposit, including gas only, electric only and combined customers? If not, please explain what the figures listed represent.

b. In a format similar to that provided in response to A-20(a), state the number of residential customers for whom LG&E received assistance payments from community action councils or community action agencies as described in response to ACM and POWER A-2(a) who were required to pay a deposit for the test year and the three preceding calendar years.

c. In reference to LG&E's response to A-20(e) please explain why LG&E would not allow customers to spread deposits over more than the currently allowed three months.

12. Please refer to Response to ACM and POWER A-21

a. In A-21(b) which describes six attributes reviewed monthly, will payments received by LG&E after ten days but before fifteen days count toward the "number of times delinquent in the past eight months?"

b. Under LG&E's proposed ten day collection cycle, if a customer regularly pays after the ten day due date, but before fifteen days, will this behavior impact the customer's account in any way, behavioral scoring or otherwise? If so, please describe how.

13. Please refer to Response to ACM and POWER A-22 and A-23

a. Please explain more clearly the meaning of the statement "the numbers below reflect only pledge payments that had a pledge identification number." Does this mean that there may be other pledges made or received that do not have a pledge identification number? Or does it mean that the amounts were only pledged but not necessarily received?

b. Please identify the agencies which pledged funds that are included in the response to A-22.

c. Please identify the agencies which pledged funds that are included in the response to A-23.

14. Please refer to Response to ACM and POWER A-24

a. Please explain why LG&E would not be willing to extend the period of time in which it allows reconnection pursuant to the Winter hardship reconnection provisions of 807 KAR 5:006 Section 15 from the currently required Winter months to throughout the year?

Respectfully submitted,



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