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August 27, 2008

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VIA HAND DELIVERY

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RE: In the Matter of:

Ronald Marstin
Managing Attorney
Urban 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

Andre Bergeron
Jeffrey S. Brown
Ted D. Hardwick
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Lisa Kilkelly
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Barbara A. Sullivan
Amy Kari Turner
Bridget Ward
Stephanie C. Willis
John Young

Enclosed for filing in the above-captioned case are an original and ten (10) copies of a First 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 Worling
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

**Wyatt, Tarrant &
Combs Follows:**
Shawn S. Meekel

IOETA Fellows:
Nellie McCall
Betsy Jones

Cc: parties of record



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

AUG 27 2008

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)	

**FIRST 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. In the Testimony of William Steven Seelye at page 12, Mr. Seelye states the average monthly usage for LG&E customers is 1,066 kWh per month.

a. Is the average monthly usage of 1,066 kWh referred to by Mr. Seelye for residential customers? If not, please specify the class of customers.

b. Please provide the supporting calculation for Mr. Seelye's 1,066 kWh figure including the months included, the monthly usages and the monthly numbers of customers.

c. Using a similar calculation, please provide the average monthly gas usage for LG&E residential gas customers, and provide the supporting calculation as described above in 1(b).

2. At page 12 of Mr. Seelye's Testimony, he states "the average monthly usage for LG&E's low income customers is 1,084 kWh per year."

a. At page 12 of his Testimony, Mr. Seelye implies that the average monthly usage of 1,084 kWh for LG&E's low income customers is derived from data about customers who meet the state standards for participating in low income energy assistance programs ("LIHEAP"). Please confirm that this understanding is correct. If not correct, please explain the source of his statement.

b. Please describe how LG&E obtained the data about customers who meet state standards for participating in low income energy assistance programs ("LIHEAP") referred to by Mr. Seelye.

c. How did LG&E determine that these customers met the state standards for participating in low income energy assistance programs ("LIHEAP")?

d. Please list all low income energy assistance programs LG&E used in determining this pool of customers as referred to by Mr. Seelye at page 12 of his Testimony.

e. In the sentence quoted above in 2, is the "1,084 kWh per year" accurate, or did Mr. Seelye intend to say "1,084 kWh per month?"

f. Please provide the supporting calculation for Mr. Seelye's 1,084 kWh figure including the months included, the monthly usages and the monthly numbers of customers used in the calculation.

g. Using a similar calculation to the one requested in 2(f), please provide the average monthly gas usage for LG&E residential gas customers who meet the state standards for participating in low income energy assistance programs ("LIHEAP"), and provide the supporting calculation as described above in 2(f).

3.a Please describe the sales data that LG&E collected on the customers who meet state standards for participating in low income energy assistance programs ("LIHEAP") customers referred to on page 12 of Mr. Seelye's testimony.

b. In addition to the sales data, did LG&E collect any other type of data on these customers? If so, please provide such data.

c. Please describe what other data LG&E has the ability to collect regarding this pool of customers.

4. State the monthly number of residential electric customers from January 1, 2005 to June 30, 2008.

5. State the monthly number of residential electric customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") from January 1, 2005 to June 30, 2008.

6. State the monthly number of residential gas customers from January 1, 2005 to June 30, 2008.

7. State the monthly number of residential gas customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") from January 1, 2005 to June 30, 2008.

8. Please provide the monthly number of disconnections for nonpayment for the electric residential class from January 1, 2005 to June 30, 2008.

9. Please provide the monthly number of disconnections for nonpayment for electric customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") from January 1, 2005 to June 30, 2008

10. Please provide the monthly number of disconnections for nonpayment for the gas residential class from January 1, 2005 to June 30, 2008

11. Please provide the monthly number of disconnections for nonpayment for gas customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") from January 1, 2005 to June 30, 2008.

12. Please provide the annual number of disconnections for nonpayment of electric residential customers broken down by zip code for the test year and three preceding years.

13. Please provide the annual number of disconnections for nonpayment of gas residential customers broken down by zip code for the test year and three preceding years.

14. In the Testimony of Paul W. Thompson at page 5, Mr. Thompson describes the Trimble County Unit No. 2 ("TC2") and states that of the 563MW generation capacity that the Companies will own, LG&E will be entitled to 19% and KU will be entitled to 81%. Will the Companies' costs associated with this construction be allocated according to similar percentages, that is, with LG&E paying 19% and KU paying 81% of costs? If not, please explain the percentages that each Company will pay and explain the rationale for this difference.

15. What is the expected date of implementation of the new Customer Care Solution system ("CCS") referenced by Chris Hermann in his Testimony at page 12?

16. In the Testimony of Sidney L. "Butch" Cockerill at page 2, Mr. Cockerill describes the elimination of a policy that the Companies pay for customers' meter bases and that the Companies will no longer supply single phase meter bases of the kinds used in residential applications.

a. State the approximate cost of a meter base.

b. State the amounts that LG&E spent annually for calendar years 2005, 2006 and 2007 on:

i. paying for customers' meter bases; and

ii supplying single phase meter bases of the kinds used in residential applications.

c. Does LG&E require residential customers to replace meter bases? If so, under what types of circumstances?

17 Regarding the proposed increase from \$20 to \$29 in the disconnect/reconnect charge for electric and gas:

a. In Mr. Cockerill's SLC Exhibit 3 to his testimony, please provide a breakdown of the \$14.50 cost for disconnect service by labor, transportation, supplies and equipment and a similar breakdown for the reconnect service.

b. State the monthly number of disconnect/reconnect charges imposed on residential electric customers beginning January 1, 2005 through June 30, 2008.

c. State the monthly number of disconnect/reconnect charges imposed on residential electric customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") beginning January 1, 2005 through June 30, 2008.

d. State the monthly number of disconnect/reconnect charges imposed on residential gas customers beginning January 1, 2005 through June 30, 2008.

e. State the monthly number of disconnect/reconnect charges imposed on residential gas customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") each month beginning January 1, 2005 through June 30, 2008.

18. Regarding the proposed meter test charges:

a. When a customer requests a meter test, what kind of notice does LG&E give the customer regarding the potential meter test charge?

b. State the number of meter test charges imposed on residential electric customers for the test year and three preceding calendar years.

c. State the number of meter test charges imposed on residential electric customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") for the test year and three preceding calendar years.

d. State the number of meter test charges imposed on residential gas customers for the test year and three preceding calendar years.

e. State the number of meter test charges imposed on residential gas customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") for the test year and three preceding calendar years.

19. Regarding the proposed increase in the returned payment charge, on Mr. Cockerill's SLC Exhibit 5, please clarify and explain the line describing the labor cost including the meaning of the .88735 figure and how the \$33.48 relates to the \$5.58 figure.

a. State the number of returned payment charges imposed upon residential electric customers for the test year and the three preceding calendar years.

b. State the number of returned payment charges imposed upon electric residential customers who met the state standards for participating in low income energy assistance programs ("LIHEAP") for the test year and the three preceding calendar years.

c. State the number of returned payment charges imposed upon residential gas customers for the test year and the three preceding calendar years.

d. State the number of returned payment charges imposed upon gas residential customers who met the state standards for participating in low income energy assistance programs (“LIHEAP”) for the test year and the three preceding calendar years.

20. Regarding the proposed increase in deposits:

a. State the number of residential electric customers required to pay a deposit for the test year and the three preceding calendar years. State the average amount of deposit required.

b. State the number of residential electric customers who met the state standards for participating in low income energy assistance programs (“LIHEAP”) who were required to pay a deposit for the test year and the three preceding calendar years. State the average amount of deposit required.

c. State the number of residential gas customers required to pay a deposit for the test year and the three preceding calendar years. State the average amount of deposit required.

d. State the number of residential gas customers who met the state standards for participating in low income energy assistance programs (“LIHEAP”) who were required to pay a deposit for the test year and the three preceding calendar years. State the average amount of deposit required.

e. If the Commission approves LG&E’s requested higher deposit amounts, would LG&E consider allowing customers to spread the deposit over more than the currently allowed three months?

21. At page 5 of his testimony Mr. Cockerill describes proposed changes to LG&E’s collection cycle and late payment policy.

a. Please describe any impact on LG&E’s revenue or expenses if the Commission approves this change.

b. Please describe in detail the behavioral scoring systems referenced by Mr. Cockerill at page 5 of his Testimony and how late payment would affect such score.

c. Pursuant to LG&E’s proposed ten day collection cycle, does LG&E consider a payment postmarked within the ten day period timely, or must payment actually be received within the ten day period?


d. Describe the impact of a customer’s late payment or payments on his/her relationship with LG&E such as in the area of LG&E requirements pertaining to customer deposits and issuance of brown bills.

22. Please state the monthly number of customers in Jefferson County for whom LG&E has received assistance funds from non-LIHEAP energy assistance providers for each month beginning January 1, 2005 through June 30, 2008. Please indicate the monthly amount of such funds.

23. Please state the monthly number of customers in the LG&E service territory for whom LG&E has received assistance funds from non-LIHEAP energy assistance providers for each month beginning January 1, 2005 through June 30, 2008. Please indicate the monthly amount of such funds.

24. Would LG&E 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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(502) 614-3116
Attorney for ACM and POWER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Request for Information of ACM and POWER was served on the following parties on the 27th day of August, 2008 by United States mail, postage prepaid.



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