COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF BASE RATES

CASE NO. 2008-00252

INITIAL REQUESTS FOR INFORMATION ON BEHALF OF CAK

Community Action Kentucky, Inc. (CAK) hereby submits the following Initial Request

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for Information to Louisville Gas and Electric Company (LG&E):

- How many LG&E residential accounts were shut off for non-payment in each year 2003, 2004, 2005, 2006 and 2007?
- How many LG&E residential accounts were shut off for non-payment during the period 1/1/2008 through 7/31/2008?
- 3. What is the total amount of funding LG&E has contributed in each year 2003, 2004, 2005, 2006 and 2007 to programs that directly assist its customers who have difficulty paying their bills?
- How much have LG&E ratepayers, through voluntary donations given through billing statements, contributed to the Wintercare Energy Fund in each year 2003, 2004, 2005, 2006, and 2007? Also, how many ratepayers gave in each of those years?
- 5. How many low-income households, defined as having incomes at or below 100 percent of the federal poverty line defined by the U.S. Department of Health and Human Services, reside in the areas served by LG&E?

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- 6. How many LG&E residential accounts are held by individuals age 65 and older?
- 7. What are the mean and median total monthly costs for residential customers in the LG&E service territory?
- 8. The current mean and median total monthly residential costs, i.e., the amounts reported in response to the preceding question, are what percentage of the monthly income for households of one, two, and three persons, respectively, with incomes at 100% of the Federal Poverty Level?
- 9. Based on the requested residential rate increase, what will be the real dollar annual increase for the mean and median residential customer?
- 10. The proposed mean and median total monthly residential costs, i.e., the amounts reported in response to the preceding question, are what percentage of the monthly income for households of one, two, and three persons, respectively, whose incomes are at 100% of the Federal Poverty Level?
- 11. Assuming approval of the requested residential rate increase, what will be the estimated mean and median total monthly costs for residential customers?
- 12. How many residential customers use 1,000 KWh or less each month and what percentage of that is the LG&E residential customer base? What are the mean, median and mode averages for residential monthly usage amounts in KWh?
- 13. What were the total arrearages owed by residential customers for the first four months of each year 2007 and 2008?

- 14. Given that the proposed increase in rates will make the cost of energy less affordable for many residential customers, does LG&E have a plan to prevent increases in its shutoff rates and the amount of arrearages owed by its residential customers?
- 15. How many residential customers did LG&E have in each of the years 2003, 2004, 2005, 2006, and 2007?
- 16. How many residential customers experienced a disconnection of LG&E service due to nonpayment in each of the years 2003, 2004, 2005, 2006, 2007?

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ATTORNEY FOR COMMUNITY ACTION KENTUCKY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served on the following persons by United States mail on this the 25^{th} day of August, 2008:

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