

BATES & SKIDMORE

ATTORNEYS AT LAW
415 W. MAIN STREET, SUITE 2
FRANKFORT, KENTUCKY 40601
PH: 502-352-2930
FAX: 502-352-2931
BatesAndSkidmore@gmail.com

JACK B. BATES

IRIS G. SKIDMORE

Via Hand-Delivery

February 26, 2010

RECEIVED

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

FEB 26 2010

PUBLIC SERVICE
COMMISSION

Re: Application of Kentucky Utilities Company for an Adjustment in Rates
Case No. 2009-00548

Dear Mr. Derouen:

Enclosed for filing in the above styled action is an original and ten copies of an Initial Request for Information on behalf of the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc.

Sincerely,



Iris G. Skidmore

Enclosure

RECEIVED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

FEB 26 2010

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)
COMPANY FOR A GENERAL ADJUSTMENT) CASE NO: 2009-00548
IN BASE RATES)

INITIAL REQUEST FOR INFORMATION ON BEHALF OF CAC

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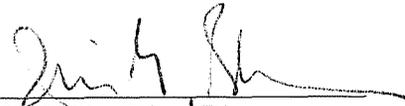
Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, and submits the following Initial Request for Information to Kentucky Utilities Company:

1. Please list the counties in which Kentucky Utilities operates and the current number of residential customers in each.
2. If SFV rate design is intended to foster energy efficiency, what energy efficiency programs does the Company propose, specifically for low-income customers?
3. Please provide the number of Kentucky Utilities residential customers who were required to pay a deposit in calendar years 2005, 2006, 2007, 2008 and 2009. Where possible, break down the number of those customers by county, Census tract, and postal zip code.
4. Please provide the number of residential customers annually who have utilized the option of spreading their deposit over the first four billing cycles since that option has been available. Of those customers, provide the number who were disconnected for non-payment by county, Census tract, and postal zip code.
5. Please provide the number of residential customers who were required to pay a deposit as a condition of reconnection for non-payment in calendar years 2005, 2006, 2007, 2008 and 2009. Where possible, break down the number of those customers by county, Census tract, and postal zip code.

6. Please provide the number of residential customers who made late payments in each of the 12 months preceding the 2009 reduction by Kentucky Utilities of the number of days between date of issuance of the bill and due date. Provide the number of residential customers who made late payments in each of the 12 months following that change.
7. Please provide an unduplicated count of the number of Kentucky Utilities residential customers who have been assessed a late payment charge since the charge's inception in 2009 and a total dollar value of those late payment charges. Where possible, break down the location of those customers by county, Census tract, and postal zip code.
8. Please provide the number of Kentucky Utilities customers who were both assessed a late payment charge and received third-party payment assistance (LIHEAP, WinterCare, etc.) in each of the previous 12 months. Please provide the dollar value of those late payment charges assessed to accounts which received third-party payment assistance.
9. How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2005, 2006, 2007, 2008 and 2009? Where possible, provide by county, Census tract, and postal zip code.
10. How many Kentucky Utilities residential accounts were shut off for non-payment during the period 1/1/2010 through the most current available date (please provide date)?
11. What is the total amount of funding Kentucky Utilities has contributed in each year 2005, 2006, 2007, 2008 and 2009 to programs that directly assist its customers who have difficulty paying their bills?
12. How much have Kentucky Utilities ratepayers, through voluntary donations given through billing statements, contributed to the Wintercare Energy Fund in each year 2005, 2006, 2007, 2008, and 2009? Also, how many ratepayers gave in each of those years?

13. What are the current mean and median total monthly costs for residential customers in the Kentucky Utilities service territory?
14. Based on the requested residential rate increase, what will be the real dollar annual increase for the mean and median residential customer?
15. Assuming approval of the requested residential rate increase, what will be the estimated mean and median total monthly costs for residential customers?
16. How many residential customers use 1,000 KWh or less each month and what percentage of that is the Kentucky Utilities residential customer base? What are the mean, median and mode averages for residential monthly usage amounts in KWh?
17. Given that the proposed increase in rates will make the cost of energy less affordable for many residential customers, does KU have a plan to prevent increases in its shutoff rates and the amount of arrearages owed by its residential customers?
18. What were the total arrearages owed by residential customers for the first four months of each year 2008 and 2009? And for the first two months of 2010?
19. Please provide the number of times in each of the previous 12 months that a residential customer was issued a bill reflecting two identical credits for third party payment assistance (one credit when a payment guarantee is made and another when payment is received, for example). Please explain why this occurs and what the Company does to help customers understand what amount they actually owe once the double credit has been corrected.

Respectfully submitted,



IRIS G. SKIDMORE
Bates and Skidmore
415 W. Main St., Suite 2
Frankfort, KY 40601
Telephone: (502)-352-2930
Facsimile: (502)-352-2931

COUNSEL FOR CAC

CERTIFICATE OF SERVICE

I hereby certify that on 26th day of February, 2010, a true and accurate copy of the foregoing Initial Request for Information on Behalf of CAC was served by United States mail, postage prepaid, to the following:

Lonnie E. Bellar
E.ON U.S. LLC
220 West Main Street
Louisville, KY 40202

Kendrick R. Riggs, Esq.
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202-2828

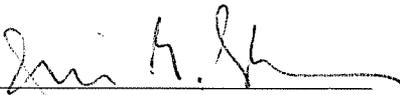
Allyson K Sturgeon, Esq.
E.ON U.S. LLC
220 West Main Street
Louisville, KY 40202

David C. Brown, Esq.
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Lawrence W. Cook, Esq.
Office of the Attorney General Utility & Rate
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

Michael L. Kurtz, Esq.
Boehm, Kurtz, and Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OH 45202

Robert M. Watt, III, Esq.
Stoll Keenon Ogden PLLC
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801



Counsel for CAC