

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS)	CASE NO.
ELECTRIC AND GAS RATES AND FOR CERTIFICATES)	2016-00371
OF PUBLIC CONVENIENCE AND NECESSITY)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO METROPOLITAN HOUSING COALITION

Metropolitan Housing Coalition ("MHC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due no later than March 31, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

MHC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which MHC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, MHC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Cathy Hinko (“Hinko Testimony”).
 - a. State whether MHC is aware that the replacement of gas service lines is only one component of Louisville Gas and Electric Company’s (“LG&E”) Gas Line Tracker (“GLT”), and that the replacement of aging and ineffectively protected and unprotected bare steel gas mains is also included in LG&E’s GLT.
 - b. State whether MHC believes replacing the aging and ineffectively protected and unprotected bare steel mains provides safety and reliability benefits to all customers.

2. Refer to the Hinko Testimony, page 16, lines 3–5, which state, “The earlier maps show that low-income neighborhoods are also where older housing exists with less energy efficient rehabilitation of homes. So there are a lot of people paying and with high volume usage.” Refer also to page 5, lines 8–10. Explain whether MHC agrees that an increase in the fixed customer charge with a decrease in the volumetric charge could, all other things being equal, actually lower bills for high-volume-usage customers such as those referenced on page 16, lines 3–5.



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DATED **MAR 17 2017**

cc: Parties of Record

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