



an e-on company

Mr. Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RECEIVED
MAR 15 2010
PUBLIC SERVICE
COMMISSION

Louisville Gas and
Electric Company
State Regulation and Rates
220 West Main Street
PO Box 32010
Louisville, Kentucky 40232
www.eon-us.com

Lonnie E. Bellar
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March 15, 2010

RE: *Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Base Rates – Case No. 2009-00549*

Dear Mr. DeRouen:

Please find enclosed and accept for filing the original and ten (10) copies of the Response of Louisville Gas and Electric Company to the First Request for Information of Association of Community Ministries dated February 26, 2010, in the above-referenced matter.

Also enclosed are an original and ten (10) copies of a Petition for Confidential Protection regarding certain information contained in the enclosed responses.

Due to the unavailability of Butch Cockerill to sign his verification page, the Company will file his verification page separately.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

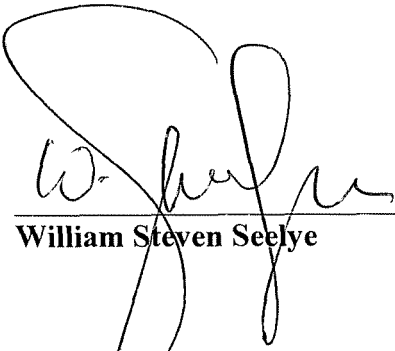
Lonnie E. Bellar

cc: Parties of Record

VERIFICATION

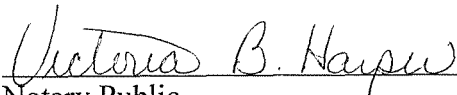
COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **William Steven Seelye**, being duly sworn, deposes and states that he is a Principal and Senior Analyst with The Prime Group, LLC, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



William Steven Seelye

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 12th day of March 2010.

 (SEAL)

Notary Public

My Commission Expires:

Sept 20, 2010

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	CASE NO.
ELECTRIC COMPANY FOR AN ADJUSTMENT)	2009-00549
OF ITS ELECTRIC AND GAS BASE RATES)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO THE
FIRST REQUEST FOR INFORMATION OF
ASSOCIATION OF COMMUNITY MINISTRIES
DATED FEBRUARY 26, 2010

FILED: March 15, 2010

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 1

Responding Witness: William Steven Seelye

- Q-1. Please state the average volume of natural gas used by residential customers for each month for calendar years 2007, 2008 and 2009.
- A-1. See attached.

Louisville Gas and Electric Company

Case No. 2009-00549

Average Residential Natural Gas Usage -- 2007, 2008, 2009 by Month

	RGS Customers	RGS Natural Gas Consumption (ccf)	Average Residential Consumption
Jan-07	298,818	30,629,289	103
Feb-07	299,492	44,968,613	150
Mar-07	300,023	32,215,522	107
Apr-07	299,846	16,245,797	54
May-07	300,345	9,036,188	30
Jun-07	300,147	4,692,688	16
Jul-07	300,052	4,070,373	14
Aug-07	299,804	3,813,373	13
Sep-07	299,040	3,875,041	13
Oct-07	299,089	4,301,658	14
Nov-07	299,801	13,045,520	44
Dec-07	299,958	27,980,798	93
Jan-08	300,275	39,210,763	131
Feb-08	300,043	39,546,640	132
Mar-08	301,037	35,204,518	117
Apr-08	300,433	19,862,683	66
May-08	300,652	8,840,848	29
Jun-08	301,166	5,334,717	18
Jul-08	300,267	4,256,096	14
Aug-08	300,012	3,675,225	12
Sep-08	299,188	3,835,981	13
Oct-08	299,038	4,522,078	15
Nov-08	288,729	13,415,898	46
Dec-08	289,610	33,803,249	117
Jan-09	290,751	41,869,084	144
Feb-09	289,692	37,993,325	131
Mar-09	289,438	27,072,161	94
Apr-09	296,207	18,279,826	62
May-09	288,580	7,616,544	26
Jun-09	290,497	4,946,544	17
Jul-09	288,258	3,992,292	14
Aug-09	291,602	3,782,571	13
Sep-09	288,902	3,847,786	13
Oct-09	291,175	6,296,124	22
Nov-09	286,687	12,595,078	44
Dec-09	291,037	27,343,320	94

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 2

Responding Witness: William Steven Seelye

Q-2. Please state the total yearly volume of natural gas used by residential customers for calendar years 2007, 2008 and 2009.

A-2. Total yearly volume of natural gas used by residential customers:

2007	194,874,860 ccf
2008	211,508,696 ccf
2009	195,634,655 ccf

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 3

Responding Witness: William Steven Seelye

- Q-3. Please provide the average residential gas bill for each month of the test year generated by the average volume provided in response to number 1 above broken down into its component parts (Customer Charge, Distribution Cost Component and Gas Supply Cost Component). Please specify the applicable rate of each component for each month.
- A-3. See attached.

Louisville Gas and Electric Company

Case No. 2009-00549

Average Residential Natural Gas Usage -- Each Month of Test Year

	RGS Customers	RGS Natural Gas Consumption (ccf)	Average Residential Consumption	Customer Charge ¹	Distribution Cost Component ²	Distribution Revenue Component ³	Gas Supply Cost	Gas Supply Cost Revenue	Total Average Residential Bill
Nov-08	288,729	13,415,898	46	\$ 8.50	\$ 0.15470	\$ 7.19	\$ 1.10867	\$ 51.51	\$ 67.20
Dec-08	289,610	33,803,249	117	\$ 8.50	\$ 0.15470	\$ 18.06	\$ 1.10867	\$ 129.40	\$ 155.96
Jan-09	290,751	41,869,084	144	\$ 8.50	\$ 0.15470	\$ 22.28	\$ 1.10867	\$ 159.65	\$ 190.43
Feb-09	289,692	37,993,325	131	\$ 9.50	\$ 0.21349	\$ 28.00	\$ 0.96425	\$ 126.46	\$ 163.96
Mar-09	289,438	27,072,161	94	\$ 9.50	\$ 0.21349	\$ 19.97	\$ 0.96425	\$ 90.19	\$ 119.66
Apr-09	296,207	18,279,826	62	\$ 9.50	\$ 0.21349	\$ 5.63	\$ 0.59913	\$ 15.81	\$ 30.94
May-09	288,580	7,616,544	26	\$ 9.50	\$ 0.21349	\$ 3.64	\$ 0.59913	\$ 10.20	\$ 23.34
Jun-09	290,497	4,946,544	17	\$ 9.50	\$ 0.21349	\$ 2.96	\$ 0.59913	\$ 8.30	\$ 20.76
Jul-09	288,258	3,992,292	14	\$ 9.50	\$ 0.21349	\$ 2.77	\$ 0.46914	\$ 6.09	\$ 18.36
Aug-09	291,602	3,782,571	13	\$ 9.50	\$ 0.21349	\$ 2.84	\$ 0.46914	\$ 6.25	\$ 18.59
Sep-09	288,902	3,847,786	13	\$ 9.50	\$ 0.21349	\$ 4.62	\$ 0.46914	\$ 10.14	\$ 24.26
Oct-09	291,175	6,296,124	22	\$ 9.50	\$ 0.21349	\$	\$	\$	\$
Test Year Totals	3,483,441	202,915,404	58						

¹ Customer charge is applied only to RS customers.

² February 2009 energy rate reflects the rate reduction that went into effect with service rendered on February 6, 2009.

³ The Gas Supply Cost component changed in November, February, May and August, and was billed on a service rendered basis. For purposes of this calculation, the average bill reflects the GSC component that went into effect in each of these months.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 4

Responding Witness: William Steven Seelye

Q-4. Please provide the following information.

- a) The average residential electric usage for each month of the test year.
- b) The average residential electric bill for each month of the test year generated by the average usage provided in response to 4(a) above broken down into its component parts (Customer Charge and Energy Charge). Please specify the applicable rate of each component for each month.

A-4. See attached.

Louisville Gas and Electric Company

Case No. 2009-00549

Average Residential Electric Usage -- Each Month of Test Year

Customers	Electricity Consumption		Total	Average Residential Consumption	Customer Charge ¹	Energy Charge ²	Energy Revenue
	RSWH	RS					
Nov-08	354,638	934,816	250,546,511	709	\$ 5.00	\$ 0.06406	\$ 45.43
Dec-08	341,223	1,188,890	352,346,321	1,036	\$ 5.00	\$ 0.06406	\$ 66.37
Jan-09	341,897	1,371,907	405,547,432	1,190	\$ 5.00	\$ 0.06406	\$ 76.24
Feb-09	342,414	1,115,127	333,206,255	976	\$ 5.00	\$ 0.06303	\$ 61.54
Mar-09	342,522	1,087,973	278,654,593	817	\$ 5.00	\$ 0.06303	\$ 51.48
Apr-09	346,425	1,277,449	283,373,810	822	\$ 5.00	\$ 0.06303	\$ 51.79
May-09	345,844	920,321	247,422,357	718	\$ 5.00	\$ 0.06303	\$ 45.26
Jun-09	345,121	998,237	374,790,278	1,089	\$ 5.00	\$ 0.06303	\$ 68.63
Jul-09	342,134	868,181	445,523,214	1,305	\$ 5.00	\$ 0.06658	\$ 86.87
Aug-09	344,697	809,190	421,007,279	1,224	\$ 5.00	\$ 0.06658	\$ 81.48
Sep-09	341,244	829,360	403,459,158	1,185	\$ 5.00	\$ 0.06658	\$ 78.88
Oct-09	343,364	805,130	288,521,140	843	\$ 5.00	\$ 0.06658	\$ 56.10
Test Year Totals	4,131,523	12,206,581	4,084,398,348	992			

¹ Customer charge is applied only to RS customers.

² February 2009 energy rate reflects the rate reduction that went into effect with service rendered on February 6, 2009.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 5

Responding Witness: Lonnie E. Bellar

- Q-5. How long will it take LG&E to recover the construction cost of the Trimble County Unit No. 2 ("TC2") if LG&E's current application is approved?
- A-5. The average depreciable life of TC2 is approximately 37 years under current LG&E depreciation rates.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 6

Responding Witness: Butch Cockerill

Q-6. Please provide an itemized breakdown of the current cost for LG&E to:

- a) disconnect a residential customer;
- b) reconnect a residential customer.

A-6. Listed below is an itemized breakdown of the current cost for LG&E to disconnect and reconnect a customer. Costs are based on the average cost per service order (\$14.50). Cost per service order consists of labor, transportation, supplies, and equipment. Front and back office service order processing expenses are not included.

a) Cost to Disconnect a Residential Customer

Labor - Company	8.43
Transportation - Company	1.20
Contractors	4.66
Supplies and Equipment (other)	<u>0.21</u>
Total Costs	14.50

b) Cost to Reconnect a Residential Customer

Labor - Company	8.43
Transportation - Company	1.20
Contractors	4.66
Supplies and Equipment (other)	<u>0.21</u>
Total Costs	<u>14.50</u>
Total	\$ <u>29.00</u>

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 7

Responding Witness: Butch Cockerill

Q-7. Please provide the following information.

- a) For calendar year 2009, state the number of residential gas customers required to make a deposit as a condition of reconnection following disconnection for non-payment.
- b) Provide a breakdown of how many of the gas deposits listed in response to 7(a) above were charged in a lump sum and how many were charged in installments.
- c) Of the lump sum gas deposits listed in response to 7(b) above, how many were paid in full?
- d) Of the gas deposits charged in installments listed in response to 7(b) above, how many were paid in full?
- e) For calendar year 2009, state the number of residential electric customers required to make a deposit as a condition of reconnection following disconnection for non-payment.
- f) Provide a breakdown of how many of the electric deposits listed in response to 7(e) above were charged in a lump sum and how many were charged in installments.
- g) Of the lump sum electric deposits listed in response to 7(f) above how many were paid in full?
- h) Of the electric deposits charged in installments listed in response to 7(f) above, how many were paid in full?

- A-7. Data elements tracking deposits as a condition of reconnection were not available in the Company's Customer Information System which was replaced on March 31, 2009. The following responses were retrieved from that system's replacement for the dates April 1, 2009 through December 31, 2009.
- a) 6,812 residential gas customers were required to make a deposit following disconnection for non-payment.
 - b) 6,332 residential gas customers were charged in installments and 480 were charged in lump sum.
 - c) 410 residential gas customers have paid the lump sum deposits in full.
 - d) 5,590 residential gas customers have paid the installments in full.
 - e) 7,936 residential electric customers were required to make a deposit following disconnection for non-payment.
 - f) 7,302 residential electric customers were charged in installments and 634 were charged in lump sum.
 - g) 528 residential electric customers have paid the lump sum deposits in full.
 - h) 6,659 residential electric customers have paid the installments in full.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 8

Responding Witness: Butch Cockerill

- Q-8. Please provide the following information.
- a) The cost during the test year to LG&E of its existing policy of allowing customers from whom a deposit is required as a condition of reconnection after disconnection to pay in installments and how such cost is calculated.
 - b) Describe all factors considered, data relied upon and any other analysis of any type that LG&E used in developing its proposed change to deposits, restricting the option to pay by installments to customers whom LG&E has not required a deposit as a condition of reconnection following disconnection for non-payment (described in the Testimony of John Wolfram, Page 5, Lines 1 – 8).
 - c) Copies of all materials and workpapers developed or reviewed in connection with such analysis described in 8(b) above.
- A-8.
- a) The Company has not calculated a “cost” associated with this policy. However, the data provided in answer b (below) indicates that customers on deposit installment plans are defaulting on those plans at a high rate.
 - b) The information presented below covers the period April 1, 2009 – December 31, 2009. The data indicates a high rate of default among all types of deposit installment plans. Based on this data, the Company believes that customers who have proven themselves a credit risk should not be allowed to pay deposits in installments.

Deposit Installment Type	Installments Granted	Installments Defaulted	% Defaulted
1 Month	13,340	10,659	80%
2 Month	875	709	81%
3 Month	2,230	1,808	81%
4 Month	16,114	13,159	82%

c) See above.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 9

Responding Witness: Butch Cockerill

- Q-9. Please provide the following information for a residential customer who has paid a \$295 deposit which is being held by LG&E and who is disconnected for nonpayment of a \$150 bill.
- a) How much of the deposit would LG&E return to the customer? Please itemize any charges that LG&E would take out of the deposit.
 - b) Please provide the timeframe in which LG&E would return any remaining deposit to the customer.
- A-9. a) Assuming the customer does not request reconnection, a final bill would be prepared. At such time, generally 15 days following the nonpay disconnect, all accrued interest, plus the balance of the deposit necessary to cover the \$150 amount due, would be applied to the account. Whatever charges make up the \$150 balance due would be offset by the required deposit amount. If the customer is subsequently reconnected within 15 days, no deposit or interest is applied. The deposit is maintained, per the Company's approved tariff.
- b) Any deposit balance remaining after the aforementioned application would be sent to the customer by check, approximately 30 days after the final bill is issued.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 10

Responding Witness: Butch Cockerill

Q-10. Please state the monthly number of low income residential customers who were disconnected during the test year. Of these customers how many were subsequently reconnected?

A-10. This list includes the monthly number of disconnections for electric-only, gas-only, and combination customer accounts that received pledge amounts from community action councils, community action agencies, and other organizations only. We are unable to determine the income levels of all of our customers. Disconnects may or may not have occurred during the month that the pledge payment was received.

<u>Year/Month</u>	Number of Customer <u>Disconnects</u>	Number of Customer <u>Reconnects</u>
2008/11	1,724	1,374
2008/12	1,603	1,152
2009/01	1,390	893
2009/02	1,182	682
2009/03	772	246
2009/04	201	109
2009/05	1,500	1,286
2009/06	1,566	1,392
2009/07	1,027	1,027
2009/08	1,035	975
2009/09	1,026	995
2009/10	816	799

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 11

Responding Witness: Butch Cockerill

- Q-11. Please describe any customer data available to LG&E relating to whether its residential customers are low income.
- A-11. LG&E does not designate residential customers according to financial status. However, for purposes of answering this question LG&E assumes that customers may be considered low income if they have been assigned a pledge ID or receive an HEA credit.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 12

Responding Witness: Butch Cockerill

Q-12. Please provide the following information.

- a) The monthly number of disconnections for nonpayment for the residential electric class from July 1, 2008 through December 31, 2009.
- b) The monthly number of disconnections for nonpayment of residential electric customers who received assistance from a third party agency for whom LG&E has assigned a pledge identification number from July 1, 2008 through December 31, 2009.
- c) The monthly number of disconnections for nonpayment for the residential gas class from July 1, 2008 through December 31 2009.
- d) The monthly number of disconnections for nonpayment of residential gas customers who received assistance from a third party agency for whom LG&E has assigned a pledge identification number from July 1, 2008 through December 31, 2009.

A-12. The attached list includes the monthly number of disconnections for electric-only, gas-only, and combination customer accounts that received pledge amounts from community action councils, community action agencies, and other organizations. Disconnects may or may not have occurred during the month that the pledge payment was received.

Attachment to Response to LGE ACM-1 Question No. 12

<u>Year/Month</u>	(a) Number of Electric Residential Disconnects for Nonpayment	(b) Number of Electric Residential Disconnects for Who Received Assistance	(c) Number of Gas Residential Disconnects for Nonpayment	(d) Number of Gas Residential Disconnects for Who Received Assistance
2008/07	143	17	760	17
2008/08	141	6	504	6
2008/09	62	7	238	7
2008/10	579	35	573	35
2008/11	408	35	508	35
2008/12	364	18	362	18
2009/01	260	16	192	16
2009/02	220	4	153	4
2009/03	2	1	49	1
2009/04	1,263	121	62	3
2009/05	10,755	215	449	3
2009/06	9,950	142	766	7
2009/07	9,634	122	416	11
2009/08	10,486	124	384	6
2009/09	9,554	92	368	4
2009/10	7,033	61	209	1
2009/11	5,446	335	190	11
2009/12	4,140	179	193	4

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 13

Responding Witness: Butch Cockerill

Q-13. Please provide a list of all third party assistance agencies for whom LG&E has assigned a pledge identification number.

A-13. See below

LG&E Third Party Assistance Agencies

Affordable Energy Corp
Bullitt County Multi-Purpose CAA
Bates Community Development
Baptist Fellowship Center
Bridges of Hope Neighborhood Place
Barrett Neighborhood Place
Community Action Partnership
Church
Central Kentucky Community Action
Cabbage Patch Settlement House
UJIMA-Duvalle Education Center Neighborhood Place
Department of Human Services
Eastern Area Community Ministries
East Louisville Community Ministries
Fairdale Area Community Ministries
Fourth Avenue United Methodist Church
Fern Creek Highview United Ministries
Fairdale Neighborhood Place (S. Jeff.)
Greater Cane Run Neighborhood Place
Highlands Community Ministries
Help Ministries of Central Louisville
Helping Hands of Heartland
Northern Hardin Temp. Assistance Hope
Henry County Tri-County CAA
JTown Area Ministries
Jefferson County Department for Human Services
Larue County Community Action

Multi-Purpose CAA
M.U.S.C.L.E. (Min. Unit. S Cent. Louis)
Mt. Washington Community Ministry
Mt. Washington Community Ministries
Northern Kentucky CAP – Carroll County
Northern Kentucky CAA – Campbell
Ninth and O Baptist Church
Northwest Shawnee Neighborhood Place
Oldham County Tri-County CAA
Other
Presbyterian Community Center
Red Cross
St. Vincent DePaul – St. Agnes
St. Vincent DePaul – St. Albert the Great
Salvation Army
Shively Area Ministries
Spencer County Multi-Purpose CAA
Shelby County Multi-Purpose CAA
South Central Neighborhood Place
Seven County Services
Seven County Services
South East Associated Ministries
St. Elizabeth Ann Seaton Church
Southeast Christian Church
South Louisville Community Ministries
Saint Matthews Area Ministries
St. Vincent DePaul – St. Gabriel
Sister Visitor Center
Southwest Community Ministries
Tri-County Community Action – LaGrange
Thomas Jefferson Neighborhood Place
Trimble County Tri-County CAA
United Crescent Hill Ministries
Valley High Neighborhood Place (S. Jeff.)
Volunteers of America – Louisville
West Louisville Community Ministries
Walnut Street Baptist Church Community Ministries

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 14

Responding Witness: Butch Cockerill

Q-14. For each of the following programs:

- a) State the number of residential customers who participated in such program during the test year, and
- b) The number of residential customers who received an assistance payment from a third party agency for whom LG&E has assigned a pledge identification number who participated in such program during the test year;
 - (i) Budget Payment Plan
 - (ii) Automatic Bank Club
 - (iii) E - Bill
 - (iv) Installment plans.

A-14. a) On average 49,384 customers participated in Budget Payment Plan and 58,566 customers participated in Automatic Bank Club. There was a total count of 20,412 E-Bill and 109,381 Installment plan participants of which some may have been counted twice.

- b) The following includes customer accounts that received pledge amounts from community action councils, community action agencies, and other organizations.
 - (i) 1,791 customers participated in Budget Payment Plan.
 - (ii) 141 customers participated in Automatic Bank Club.
 - (iii) 96 customers participated in E-Bill.
 - (iv) 4,371 customers participated in Installment Plans.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 15

Responding Witness: Butch Cockerill

Q-15. Please provide the following information relating to installment plans as referred to in the Testimony of John Wolfram at Page 6, Line 22.

- a) Describe the guidelines for installment plans.
- b) Describe how customers are notified of their options under installment plans.
- c) Provide copies of the guidelines and all training or instructional material related to installment plans.

A-15. a) Installment plans are negotiated with customers in accordance with Kentucky Public Service Commission Regulation 807 KAR 5:006. General Rules, Section 13, Subsection (2).

- b) Customers are notified of options during conversations with Customer Service Representatives in the Company's call centers and business offices, as well as in the Customer Bill of Rights, available in each business office.
- c) See attachments. A petition for the confidential treatment of the redacted portion of this information is being filed simultaneously herewith.

Welcome

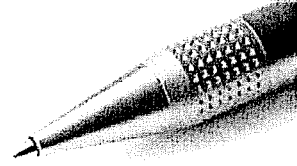


8021 Installment Plans

Module Objectives

After completing this module you will be able to:

- Understand how to Create, Maintain, and Display Installment Plans (IP)
- Understand Installment Plan (IP) types and categories
- Understand how customers can create Installment Plans (IP) over the CSS website
- Be aware of the Installment Plan (IP) reports available



IP Explanation

An Installment Plan (IP) is used when arrangements are needed so a customer can pay their balance due or a deposit at a later date.

- *An IP can be set up for payments to be made in one or multiple installments.*
- *Installment Due Dates will vary if the Monthly IP is selected. The dates will sync with the normal bill due dates as subsequent bills are rendered.*
- *Creation of an IP does NOT stop LPC processing.*
- *IPs may be set up for Daily, Weekly, BI-weekly or Monthly payments.*
- *CSR MUST inform the customer that if the Installment Plan payments are not made on time and the plan defaults that the customer's service is in danger of disconnection at any time.*

Installment Plans (IP) include:

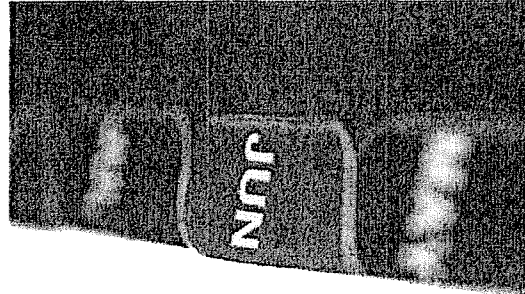
- *Category (auto-populated based on IP Type)*
- *Type*
- *Start Date*
- *Amount - the total amount; select items to determine the total*
- *Number of Payments - can be set by CSR or auto-set by CCS; if the number of payments are set, then the amounts will be auto-set by CCS. If auto-set, the amounts may be changed by the CSR, but it is not recommended*
- *Form Letter - created for all plans that are greater than 30 days*
- *Semi-automated Contact - created whenever a plan is created*

Policy for Collective or Budget

A Child account on Collective Billing cannot have an IP. A Child account requiring installments must first be removed from Collective Billing.

IPs and Budget:

- *IPs are not allowed if the customer is on Budget billing UNLESS it is a brand new customer and the IP is for the Deposit only.*
- *Existing customers must either de-enroll from Budget to enter into an installment or satisfy all installments before enrolling in Budget.*



Installment Plan Types

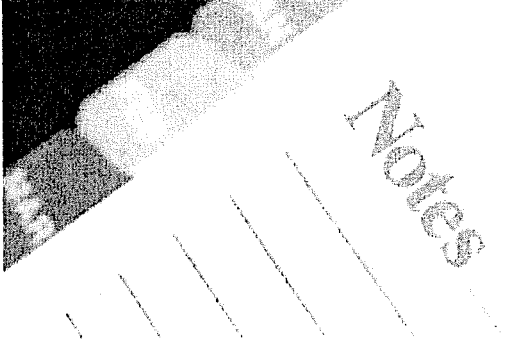
- *AMRI: AMR Legacy Installment Plan*
- *BILL: Billing Adjustment Plan*
- *BIWK: Bi-Weekly Installment Plan*
- *CLEA: Clean Start Program*
- *CNEE: Certificate of Need*
- *DAY: Daily Installment Plan*
- *DB1: Budget Deposit 1 Month Plan*
- *DB2: Budget Deposit 2 Month Plan*
- *DB3: Budget Deposit 3 Month Plan*
- *DB4: Budget Deposit 4 Month Plan*
- *DEP1: Deposit 1 Month Plan*
- *DEP2: Deposit 2 Month Plan*
- *DEP3: Deposit 3 Month Plan*
- *DEP4: Deposit 4 Month Plan*
- *HARD: Hardship Reconnect*
- *MEDD: Medical Deferment Monthly*
- *MONT: Monthly Installment Plan*
- *WEEK: Weekly Installment Plan*



Types of IPs Created in CSS

Web Installation Types:

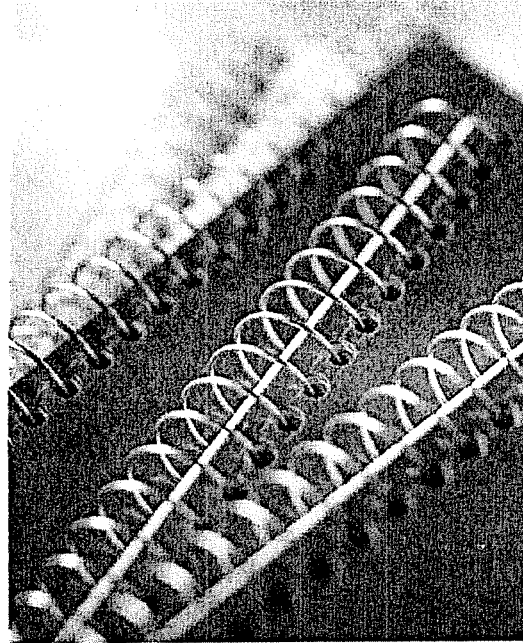
- *WEBB: Web Bi-Weekly Installation Plan*
- *WEBD: Web Daily Installation Plan*
- *WEBM: Web Monthly Installation Plan*
- *WEBW: Web Weekly Installation Plan*



Installment Plan Categories

The IP Category is automatically selected based on the IP Type selected.

- *AM AMR Legacy Installment Plan*
- *BI Billing Adjustment Plan*
- *BU Budget Deposit Installment Plan*
- *BW Bi-Weekly Installment Plan*
- *CL Clean Start Installment Plan*
- *CN Certificate of Need Installment Plan*
- *DP Deposit Installment Plan*
- *GD Daily Installment Plan*
- *GM Monthly Installment Plan*
- *GW Weekly Installment Plan*
- *HD Hardship Reconnect Installment Plan*
- *MD Medical Deferment Installment Plan*
- *WB Web Bi-Weekly Installment Plan*
- *WD Web Daily Installment Plan*
- *WM Web Monthly Installment Plan*
- *WW Web Weekly Installment Plan*



Deposit Installment Plan types

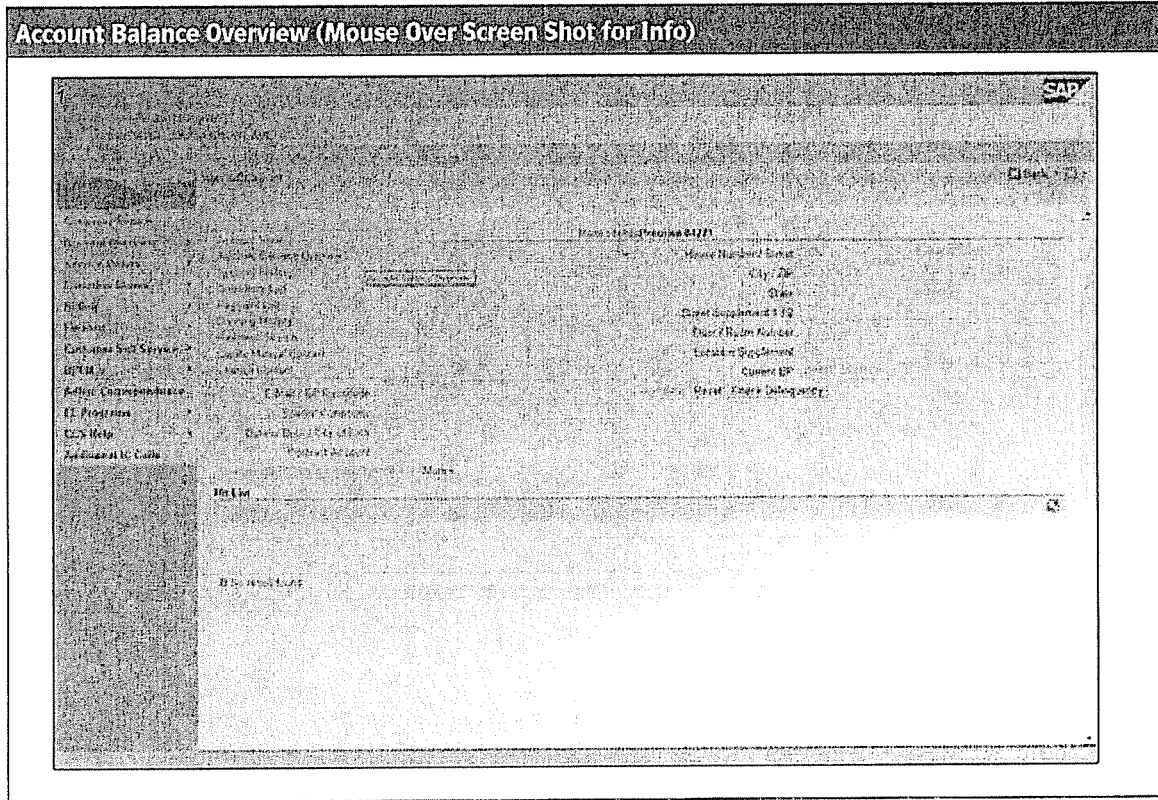
These Installment Plan types are for deposits:

Deposit Installment Plans:

- *Budget Deposit 1 Month Plan**
- *Budget Deposit 2 Month Plan**
- *Budget Deposit 3 Month Plan**
- *Budget Deposit 4 Month Plan**
- *Deposit 1 Month Plan*
- *Deposit 2 Month Plan*
- *Deposit 3 Month Plan*
- *Deposit 4 Month Plan*

**Only used if brand new customer*





1 - After confirming the Contract Account, click on the "Account Balance Overview" link. This is located in the "Account Overview" work center on the left hand side of the screen.

CONFIDENTIAL INFORMATION REDACTED

Installment Plans List (Mouse Over Screen Shot for Info)

Interaction Codes: [Redacted] SAP

Account Overview: [Redacted] All Items, Open Amount 330.60 USD, Amount Due 330.60 USD

Customer Search

Account Overview

Service Orders

Customer Moves

Billing

Finance

Customer Self Service

BP1

Ad-hoc Correspondence

IT Programs

CCS Help

Additional IC Calls

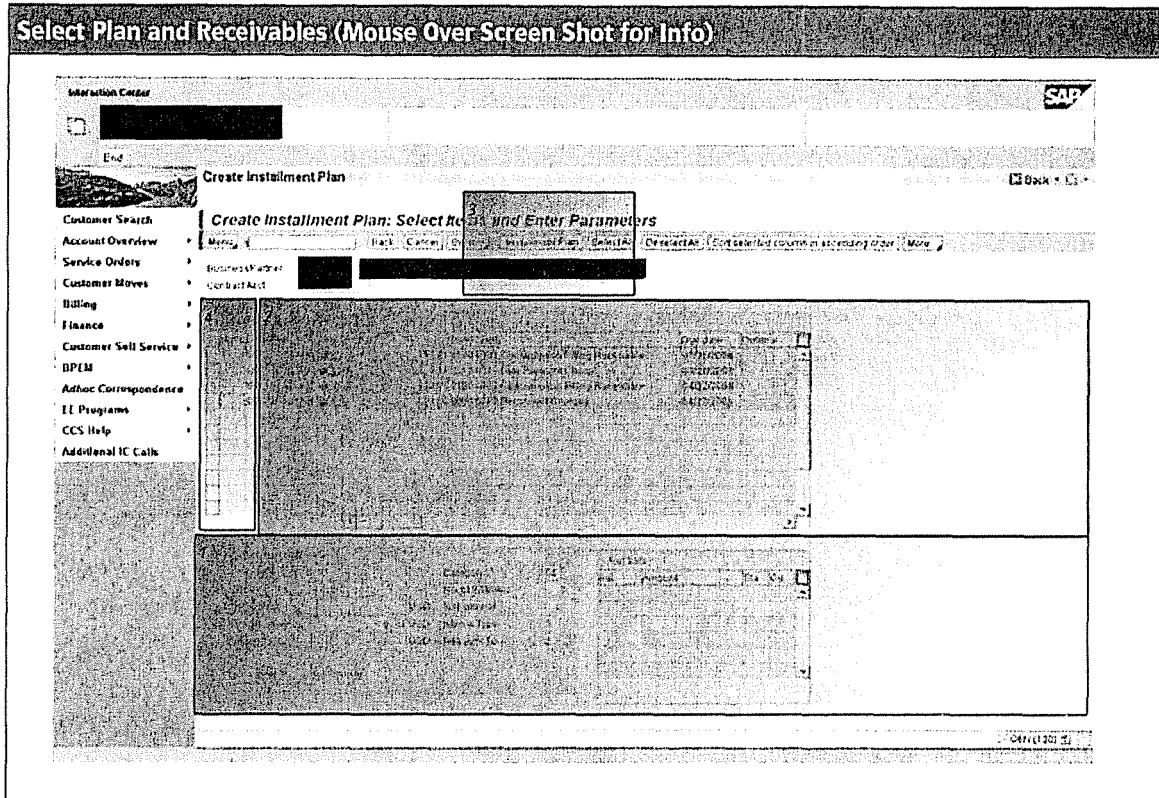
Descr.	Cont. Acc.	Plan	Cur. Amount	Forecasted Plan...	Forecasted Order	Lock	Installment Plan
Total	[Redacted]	1	330.60	330.60	0.00		
Additional Information: [Redacted] - Installment Plan - Incoming Payment							

Mouseover Menu:

- 1 - New
- 2 - Edit
- 3 - Delete
- 4 - Clear
- 5 - Business Agreement

Plan	Business Agreement	Installment Plan	Installment Total	Open Amount	Total Due	Cur.	Start Date	End Date	Instat.	Created By
[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

- 1 - Click the "Installment Plan" button to show any installment plans currently on the account.
- 2 - Click the "New" button to display the screen where you create a new Installment Plan.



- 1 - Select the 'Installment Plan type' and the 'Start Date.' The number of installments and the Installment Plan category will auto-populate.
- 2 - Select the documents for the IP. NOTE: This list does not display any statistical documents, open credit documents or documents with a split lock.
- 3 - Click the 'Installment Plan' button to create the installments.
- 4 - Item History - in the item history, a scroll icon will show the history for the item

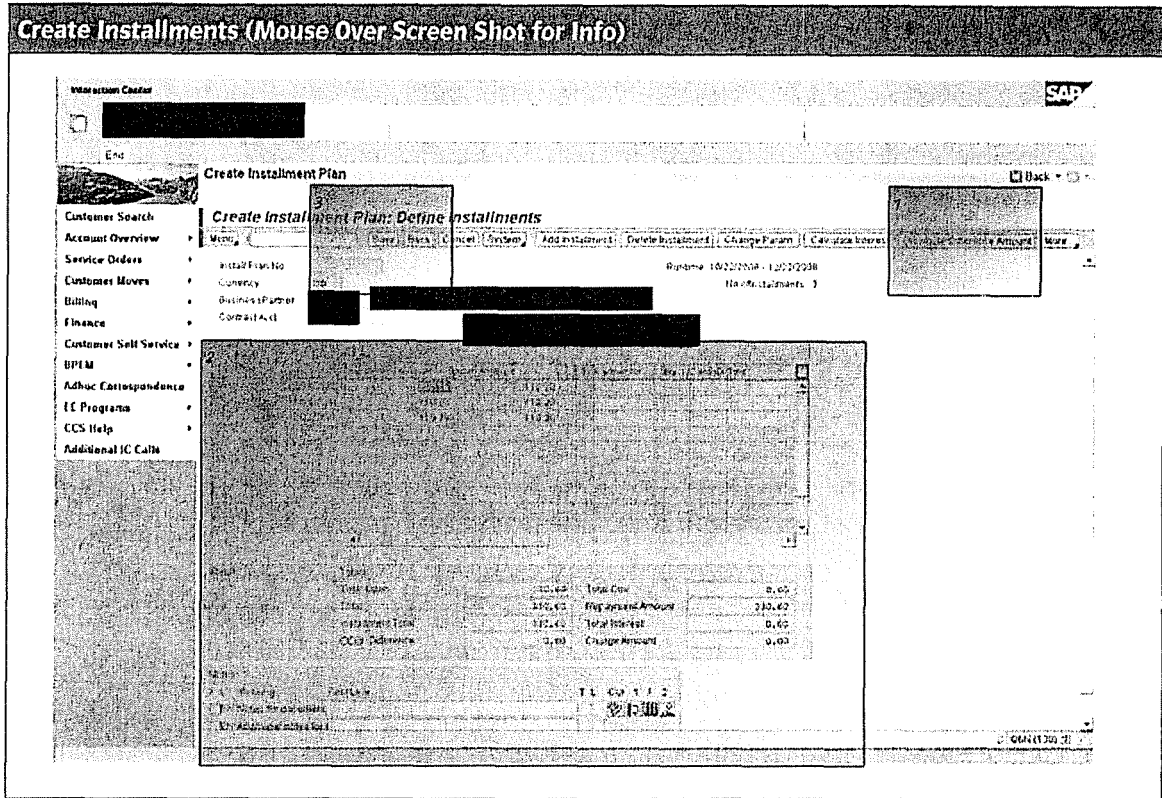
Select Plan and Receivables Notes

Select all open debit items for the Installment Plan (IP). NOTE: the list will not include any statistical documents, open credit documents or documents with a split lock.

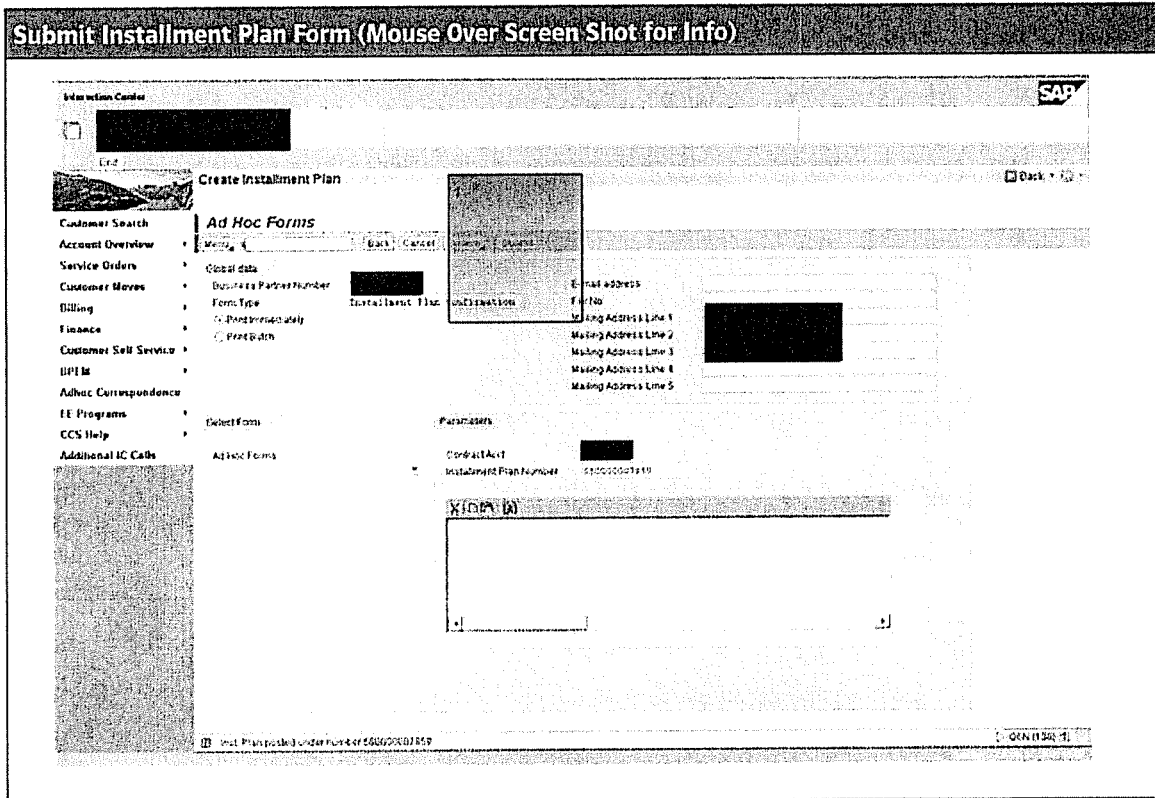
When the Installment Plan Type is selected, the Category and number of installments auto-populate.

For a Monthly IP, try to select a date that is near their next due date. When the account is billed, the installment plan dates will sync up to the next bill due date.

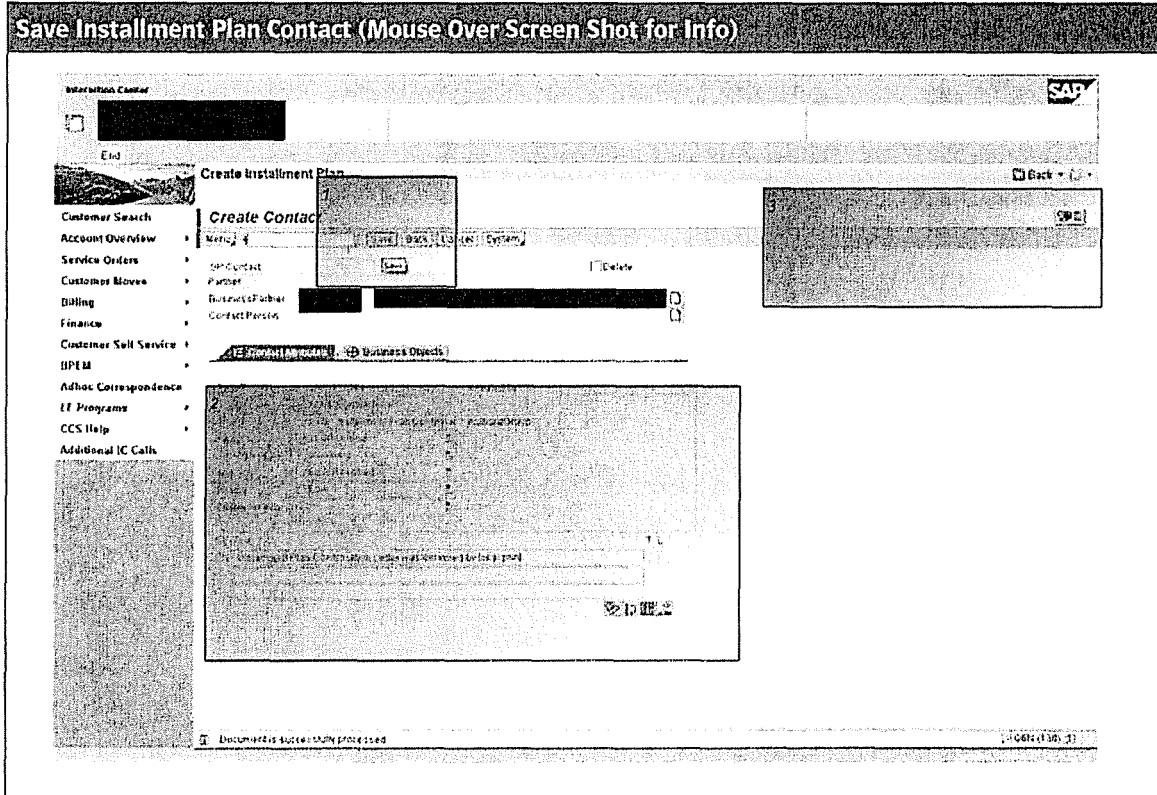
If there are current receivables that the customer would like to pay, first use the Cash Desk to make a payment; then go to the Installment Plan screen to create the IP.



- 1 - The Distribute Difference button can be used if you need to change the amounts of the installment plan. This option will distribute the remaining money across the remaining installments.
- 2 - The due dates and amounts can be changed if needed. The due dates will sync with the next billing if on a monthly installment plan type.
- 3 - Click the "Save" button to save the plan.



1 - Click the "Submit" button to submit the letter. The letter is only generated for Installment Plans that are greater than 30 days.



- 1 - Click the "Save" button to save the contact.
- 2 - The Semi-automated contact has the 'Class and Action' pre-populated. You simply need to enter the additional fields that are blank.
- 3 - A PDF copy of the Installment Plan Letter can be viewed by clicking on the Services for Object Button

View or Change Installment Plan Process (Mouse Over Screen Shot for Info)

The screenshot displays the SAP 'Account Overview' interface. At the top, it shows 'All Items, Open Amount 330.60 USD, Amount Due 0.00 USD'. A navigation menu on the left includes options like 'Customer Switch', 'Account Overview', 'Service Orders', 'Customer Moves', 'Billing', 'Finance', 'Customer Self Service', 'DPIB', 'Adhoc Correspondence', 'EE Programs', 'CCS Help', and 'Additional IC Calls'. The main content area features a table with columns: 'Description', 'Cost Area', 'Contract', 'Curr', 'Open Amount', 'Changed Base', 'Entered Status', 'Lock', and 'Installment Plan'. A single row is visible with values: '330.60', '0.00', '330.60', '0.00'. Below this table, there is a section for 'Open Installment Plans / Cleared Installment Plans / Business Agreement' with a 'Change' button. A detailed table below shows columns for 'Inst. Plan No.', 'Inst. Plan Description', 'Open Amount', 'Total Cap. Cost', 'Start Date', 'End Date', 'Inst. Plan', and 'Created By'. A row of data is visible with values: '0.00', '330.60', '10/22/2006', '12/02/2008', '003', and 'John Zander'.

- 1 - Click the "Change" button to change the Installment Plan.
- 2 - Click on the Installment Plan number to view the details.

IP Setup in CSS

Customers can create Installment Plans in CSS with the following restrictions:

- 1. Current bill only*
- 2. No defaults in previous 12 months*
- 3. No returns in previous 12 months*
- 4. No current open returned items*
- 5. No disconnect for non-payment in previous 12 months*
- 6. Not a collective billing account*
- 7. Not a budget account*
- 8. No occurrence of diversion on the account*
- 9. No active installment plans in place*

If a customer has a restriction, a message will prompt them to contact Customer Service by phone or email to process and review their installment plan request. The customer can also visit a local business office to process the installment plan.



CSS IP Selections

On CSS, customers can only choose from these IP types:

- 1. WEBB: Web Bi-Weekly Installment Plan*
- 2. WEBD: Web Daily Installment Plan*
- 3. WEBM: Web Monthly Installment Plan*
- 4. WEBW: Web Weekly Installment Plan*

Defaulting on a CSS website installment puts the account into regular dunning. The due date returns to the original due date and it is processed as a past due line item and may become eligible for disconnection.



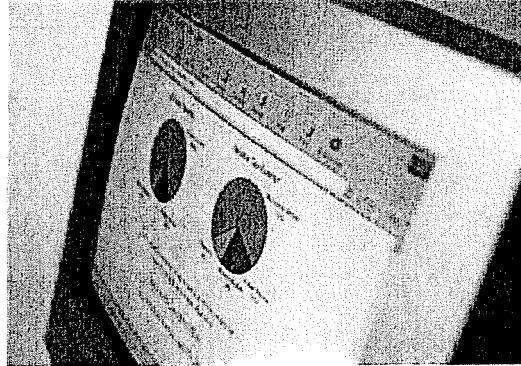
Installment Plans and Reporting

Installment Plan reports will come from the Business Warehouse reporting tool (BW) and standard SAP reports

The following reports are available:

- *Updated Installment Plan Report for installment plans that have had the due date extended*
- *Defaulted Installment Plans vs. Created Installment Plans*
- *Updated Installment Plan Report will also show if an Installment Plan has been created using previous installment plan balances*

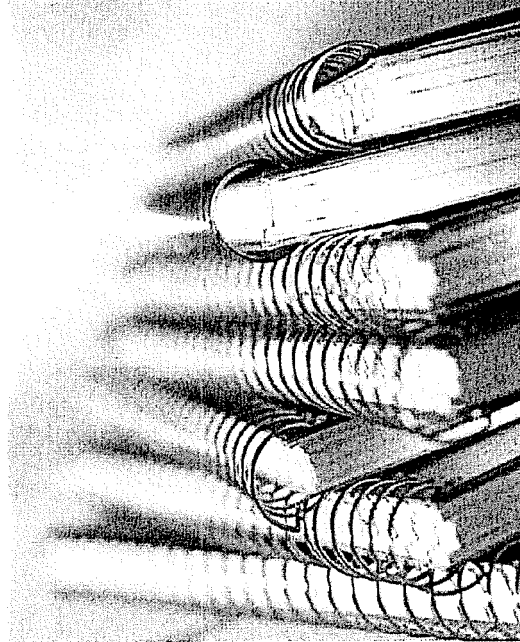
Note: BW reports use extracted data, meaning that the information is only up-to-date as of the last extract. Standard SAP reports will use real-time data, meaning the reports will show what is currently in the system.



Installment Plan Receivables

When monthly installment plan receivables are created they automatically have a clearing restriction of 'B' (Item cannot be processed until the next regular invoice) on the documents. This clearing restriction will sync up the due dates of the monthly installment plans with the due dates of the subsequent bills. Until the next bill is generated, the installment plan is not eligible to be cleared.

If the customer pays part of a monthly installment plan "early," the receivables will not be available to be cleared. Instead, the user can deactivate the original installment plan with a deactivation reason of "pre-pay." The CSR can run account maintenance to clear the debits and credits. Then the CSR will re-establish a new installment plan per the negotiated terms if the installment plan was not paid in full. (This is only necessary if the user is on a monthly installment plan and decided to pre-pay their installment plan.)



Pre-pay scenario (Mouse Over Screen Shot for Info)

Account History: [REDACTED] Open Amount 75.00 USD, Amount Due 0.00 USD Back

- Customer Search
- Account Overview
- Service Orders
- Customer Moves
- Billing
- Finance
- Process Cash Desk
- Customer Self Service
- UPR
- Adhoc Correspondence
- EL Programs
- CCS Help
- Additional IC Calls

Account History

Account ID	Account Name	Account Type	Account Status	Account Balance	Account Due	Account Date	Account Location	Account Agent	Account Action
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	33.34	33.34	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	28.53	28.53	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	28.53	28.53	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	42.00	42.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	75.00	75.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	50.00	0.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	50.00	0.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	0.00	0.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	100.00	0.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	100.00	0.00	11/15/2009	[REDACTED]	[REDACTED]	[REDACTED]

1 - Notice that a payment has been made, but the Installment Plan receivables have clearing restrictions. The clearing restrictions will have to be reset before the payment will clear the receivables.

Remove Clearing Restriction (Mouse Over Screen Shot for Info)

Change Document: Item

Save | Back | Cancel | System | Overview | Document Header | Previous item | Next item | Clear

Header Data				Navigation	
Document Date	1/04/2006	Document Type	IP	Item	1 / 1
Posting Date	1/04/2008	Currency	USD		
Document Number		Reference			
Classif. Key		Check number			

Basic data | Tax data | **Payment Data** | Dunn Data | IS-U data | Add data

Payment data

Payment Method

Payment Lock Reason

Clearing Lock

Paying Co. Code

Payment Grouping

Custom Grouping

Alternative business partner for payments

Partner

Address number

Bank details

Card ID

Clearing data

Clr post date

Clearing doc

Clearing Reason

Clearing date

Clear val. date

Clearing amount 0.00

Restriction of 8

Reset

- 1 - The restriction of 8 can be found on the Payment Data tab at the document level.
- 2 - Click the menu button to go to the CHANGE view to change the restriction. The reset button (adjacent to the restriction box) is not visible unless you are in CHANGE mode.

Create Installment Plan Monthly DEMO

Click one of the buttons to launch a Demonstration.

The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.

`\data\Create_IP_Monthly.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Create Installment Plan Weekly DEMO

Click one of the buttons to launch a Demonstration.

The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.

`\data\Create_IP_Weekly.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Create Installment Plan - Daily DEMO

*Click one of the buttons to launch a Demonstration.
The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.*

`\data\Create_IP_Daily.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Change Installment Plan Monthly DEMO

Click one of the buttons to launch a Demonstration.

The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.

`\data\Change_IP_Monthly.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Manually Deactivate Installment Plan DEMO

*Click one of the buttons to launch a Demonstration.
The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.*

\data\Deactivate_IP.sim

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Deactivate and Pre-pay Installment Plan DEMO

*Click one of the buttons to launch a Demonstration.
The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.*

`\data\PrePay_IP.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Pre-pay Installment Plan Before Deactivation DEMO

Click one of the buttons to launch a Demonstration.

The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.

`\data\PrePay_IP_not_deactvted.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

Display Installment Plan DEMO

*Click one of the buttons to launch a Demonstration.
The Auto Playback Tutorial runs through the steps without your input. The Standard Tutorial lets you click through each step. The Self Test Tutorial requires you to enter the exact data used in the tutorials.*

`\data\Display_IP.sim`

Click here to Start the Auto Playback Tutorial

Click here to Start the Standard Tutorial

Click here to Start the Self Test Tutorial

Click here to Start the Assessment Tutorial

POLICY FOR INSTALLMENT PLANS

I. Policy for Installment Plans

*Revised 10-2007, 11-2009

A. Overview

The Company is obligated, per PSC regulations, to work with customers experiencing problems in payment of their utility bill, and to arrive at a mutually agreeable credit arrangement. The guiding philosophy in negotiating a installment plan is to collect as much as possible up front and amortize the balance over as short a time period as possible. HEA commitments should be handled similar to confirmed assistance vouchers in that payment arrangement should be made on the balance less the HEA commitment amount.

Installment plans may be negotiated with any responsible party listed on the account. We assume we are dealing with a responsible party if the contact can provide the account number, and /or the account name, and /or the social security number of the customer of record as referenced in the Customer Identification policy.

B. Definitions

N/A

C. Applicability

See Kentucky Public Service Commission Regulation 807 KAR 5:006. General Rules, Section 13, Subsection (2)

D. SERVICE MEMBERS CIVIL RELIEF ACT

Service Members Civil Relief Act covers installment contracts for personal property. If a service member makes a payment under the installment contract before starting active duty, the contract cannot be terminated for non payment once the service member starts active duty. Service should not be discontinued for failure to make payments on the payment plan. This could also apply to budget billing depending on timing.

B. Terms of the Installment Plan Policy

The following guidelines should be used when negotiating an installment plan..

- Installment plans for residential customers should be established by determining the largest amount of the delinquent balance the customer can pay at the time the installment plan is established.
- Customers should be strongly encouraged to make some “good faith” payment towards their arrears when negotiating arrangements.
- Only in extreme circumstances should a new installment plan be negotiated if the prior installment plan is in default.
- Customers should be limited to no more than three to six billing periods for collecting the balance.
- The roll in of budget arrears should be carefully examined, prior to agreeing to including this in the installment plan..

These terms are subject to limitations during winter months as ordered by the Public Service Commission which are discussed in detail in Section 7, “Special Circumstances.”

Thirty (30) Day Partial Payments

The Kentucky PSC states that any partial payment plan extending beyond 30 days must be documented in writing, with the customer’s signature.

Partial Payment Plans for KU, ODP and LG&E made in the Business Offices:

- Customer Reps will complete PPP and have the customer sign while present. Customer should be provided with a copy of the signed agreement.

Partial Payment Plans for the Call Center:

- Customer Reps will complete the PPP, and CCS will mail the agreement to the customer for their signature, along with a return envelope.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 16

Responding Witness: Shannon L. Charnas / Butch Cockerill

- Q-16. Please provide the following information relating to late charges.
- a) State the monthly amount of late charge revenue LG&E received from residential gas customers from October 1, 2008 to January 31, 2010.
 - b) State the monthly amount of late charge revenue LG&E received from residential electric customers from October 1, 2008 to January 31, 2010.
 - c) State the monthly amount of late charge revenue LG&E received from residential gas customers who received assistance from a third party agency for whom LG&E assigned a pledge identification number from October 1, 2008 to January 31, 2010.
 - d) State the monthly amount of late charge revenue LG&E received from residential electric customers who received assistance from a third party agency for whom LG&E assigned a pledge identification number from October 1, 2008 to January 31, 2010.
- A-16. a. See attachment. The amount of late charge revenue received is not available by revenue class. The information presented represents the amount of late charge revenue billed to residential customers.
- b. See attachment. The amount of late charge revenue received is not available by revenue class. The information presented represents the amount of late charge revenue billed to residential customers.

c. See table below.

Month/Year	Amount
10/2008	\$1,303
11/2008	\$4,663
12/2008	\$10,142
01/2009	\$26,921
02/2009	\$35,567
03/2009	\$30,247
04/2009	\$6,952
05/2009	\$903
06/2009	\$215
07/2009	\$612
08/2009	\$537
09/2009	\$428
10/2009	\$526
11/2009	\$5,629
12/2009	\$7,474
01/2010	\$32,109

d. See table below.

Month/Year	Amount
10/2008	\$4,378
11/2008	\$8,927
12/2008	\$7,540
01/2009	\$13,343
02/2009	\$16,950
03/2009	\$14,618
04/2009	\$4,775
05/2009	\$959
06/2009	\$609
07/2009	\$3,171
08/2009	\$3,096
09/2009	\$2,814
10/2009	\$2,375
11/2009	\$11,251
12/2009	\$9,734
01/2010	\$31,185

Louisville Gas and Electric Company			
Case No. 2009-00549			
Summary of Late Charge Revenue Billed to Residential Customers			
Residential Electric and Gas Customers			
Month	Electric	Gas	Total
October 2008	\$266,839	\$75,696	\$342,535
November 2008	155,749	70,970	226,719
December 2008	156,615	174,605	331,220
January 2009	176,820	284,622	461,441
February 2009	245,390	423,936	669,326
March 2009	227,743	388,938	616,681
April 2009	363,292	497,455	860,747
May 2009	370,636	300,232	670,867
June 2009	332,163	110,718	442,882
July 2009	536,961	107,450	644,411
August 2009	482,115	90,816	572,930
September 2009	444,977	77,858	522,834
October 2009	425,862	91,811	517,673
November 2009	338,812	130,250	469,062
December 2009	305,985	203,516	509,501
January 2010	338,795	388,831	727,626
Total Late Charges Billed	\$5,168,752	\$3,417,703	\$8,586,455

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 17

Responding Witness: William Steven Seelye

Q-17. Please refer to the Testimony of William Steven Seelye at Page 11, Lines 1 through 5. Please describe in detail the experience referred to, including any data or studies, that forms the basis for Mr. Seelye's conclusions that low income customers tend to use more electric energy than the average.

A-17. Data was submitted in Case No. 2008-00252 by LG&E for low income gas and electric customers showing that low income customers had higher energy consumption than the average residential customer.

Data was submitted in Case No. 2008-00251 by Kentucky Utilities Company for low income gas and electric customers showing that low income customers had higher energy consumption than the average residential customer.

Data was submitted in Case No. PUE-2008-00076 on behalf of Northern Neck Electric Cooperative for low income electric customers showing that low income customers had higher energy consumption than the average residential customer

Data was compiled in Case No. 2003-00433 by LG&E for load income gas and electric customers showing that low income customers had higher energy consumption than the average residential customer.

Data was compiled in Case No. 2003-00434 by Kentucky Utilities Company for low income electric customers showing that low income customers had higher energy consumption than the average residential customer.

Data was compiled in Cause No. 43111 by Vectren for low income electric customers showing that low income electric customers had higher energy consumption than the average residential customer.

Sample data was compiled in Case No. 05-10003 on behalf of Nevada Power Company for low income electric customers showing that low income electric customers likely had higher energy consumption than the average residential customer.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 18

Responding Witness: William Steven Seelye

Q-18. Please provide the average monthly usage for the test year for residential customers who received assistance from a third party agency for whom LG&E assigned a pledge identification number for the following.

a) Gas

b) Electric

A-18. The information was not analyzed for the test period in this proceeding. See response to KPSC-2 Question No. 87 for data submitted for gas and electric customers in Case No. Case No. 2008-00252.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 19

Responding Witness: William Steven Seelye

- Q-19. Please refer to the Testimony of Mr. Seelye at Page 46, line 8 and provide copies of all empirical studies referred to.
- A-19. Mr. Seelye did not retain copies of the studies, but see response to ACM-1 Question No. 17.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 20

Responding Witness: William Steven Seelye

- Q-20. Please refer to the Testimony of Mr. Seelye at Page 46, Lines 10 through 12 and provide a copy of the study referred to therein.
- A-20. See response to KPSC-2 Question No. 87 for data submitted for gas and electric customers in Case No. Case No. 2008-00252.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 21

Responding Witness: William Steven Seelye

- Q-21. Please refer to the Testimony of Mr. Seelye at Page 46, Lines 12 through 18 and describe in detail the basis for the conclusions stated therein.
- A-21. Mr. Seelye's conclusions are based on personal experiences providing assistance in the development of demand-side management and other programs to numerous utilities in the United States and Canada.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response to First Request for Information of
Association of Community Ministries
Dated February 26, 2010**

Question No. 22

Responding Witness: Lonnie E. Bellar

- Q-22. In materials pertaining to the LG&E rate case on the E-On website, (www.eon-us.com) LG&E has posted a map showing a comparison of the residential electric rates of the states surrounding Kentucky to the proposed LG&E rate. (Surrounding states are Missouri, Illinois, Indiana, Ohio, West Virginia, Virginia and Tennessee.) See attached.
- a) Provide a comparison of LG&E's proposed gas rate to the rates of the surrounding states listed above.
 - b) Provide a comparison of LG&E's proposed rate of return to the rates of the surrounding states listed above.
- A-22. a) LG&E did not prepare a comparison of the gas rates of the surrounding states. The source utilized for the residential electric rates only contain electric information.
- b) The requested information is not readily available; therefore, LG&E did not prepare a comparison of the rate of return to the rates of the surrounding states.