



LEGAL AID SOCIETY

PURSUING JUSTICE. RESTORING HOPE.

LISA KILKELLY
(502) 614-3116
LKILKELLY@LASLOU.ORG

March 25, 2010

VIA EXPRESS MAIL

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

RECEIVED

MAR 26 2010

PUBLIC SERVICE
COMMISSION

RE: In the Matter of:
APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, INC. FOR AN
ADJUSTMENT OF ELECTRIC AND GAS BASE RATES, CASE NO. 2009-00549

Dear Mr. Derouen:

Enclosed for filing in the above-captioned case are an original and eleven (11) copies of the Second Request for Information of Association of Community Ministries 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.

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Lisa Kilkelly
Eileen Ordoover
Attorneys for ACM

Cc: parties of record



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAR 26 2010
PUBLIC SERVICE
COMMISSION

In The Matter Of:

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

**SECOND REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Association of Community Ministries ("ACM"), by counsel, requests 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 of 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 for which the information is sought, 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

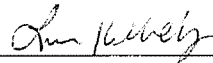
- 1) Please refer to LG&E's Response to the First Request for Information of Association of Community Ministries ("ACM") dated February 26, 2010 (hereafter referred to as "Response to ACM ") A-1.
 - a) State the average monthly temperature for each month for calendar years 2007, 2008 and 2009.
 - b) Please explain the reasons for the decrease in the number of RGS customers from 299,038 in October, 2008 to 288,729 in November, 2008.
- 2) Please refer to Response to ACM A-3.
 - a) In a format similar to the one provided in the Response, please provide the average residential gas bill for each month generated by the average volume provided in Response to ACM A-1 broken down into its component parts (Customer Charge, Distribution Cost Component and Gas Supply Cost Component) for the additional months of January 1, 2007 through October 31, 2008 and November 1, 2009 through February 28, 2010. Please specify the applicable rate of each component for each month.
 - b) Please explain the "rate reduction" referred to in footnote 2 of the Response and where such reduction appears.
- 3) Please refer to Response to ACM A-4.
 - a) Please explain the reason for the increase that appears in the Energy Charge column on the response chart starting in July 2009, and include a reference to the Commission case number and date of Order authorizing such increase.
 - b) In a format similar to the one provided in the Response, please provide the average residential electric usage and the average residential electric bill for each month broken down into its component parts (Customer Charge and Energy Charge) for the additional months of January 1, 2007 through October 31, 2008 and November 1, 2009 through February 28, 2010. Please specify the applicable rate of each component for each month.
 - c) Please explain the reasons for the decrease in the number of customers from 354,638 in November, 2008 to 341,223 in December, 2008.
- 4) Please refer to Response to ACM A-6. Please provide more detail on the basis for the numbers provided including calculations that generated the components of this Response.
- 5) Please refer to Response to ACM A-7. Please provide a breakdown of the customers listed in A-7(a) and A-7(e) by zip code.

- 6) Please refer to Response to ACM A-8(b).
- a) Please explain how the percentages of default ranging from 80 to 82% are consistent with the information provided in Response to ACM A-7 which numbers show that 88% of gas and 91% of the electric installments were paid in full.
- b) Please explain how a Deposit installment type of one month is considered an installment plan?
- 7) Please provide the annual number of disconnections for nonpayment of electric residential customers broken down by zip code for each calendar year 2008 and 2009.
- 8) Please provide the annual number of disconnections for nonpayment of gas residential customers broken down by zip code for each calendar year 2008 and 2009.
- 9) Please refer to Response to ACM A-10.
- a) Please provide the same information as provided in the Response for the additional months of the months of January 1, 2008 through October 31, 2008 and November 1, 2009 through January 31, 2010.
- b) Please break down the monthly numbers of disconnects and reconnects into gas and electric customers for the entire period requested (January 1, 2008 through January 31, 2010).
- 10) Please refer to Responses to ACM A-10 and ACM A-12.
- a) Please describe what information is included in ACM A-10 under the Number of Customer Disconnects column. Please describe how it differs from the information provided in ACM A-12 column (b) and column (d) and whether it includes the information provided in ACM A-12 columns (b) and (d).
- b) For each month from January 1, 2008 through January 31, 2010 please break down the Number of Customer Disconnects as provided in ACM A-10 into its component parts including:
- i. 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 (as in ACM A-12(b));
 - ii. 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 (as in ACM A-12 (d)); and
 - iii. such other category or categories making up the balance of the Number of Customer Disconnects as provided in ACM A-10.

- 11) Please refer to Response to ACM A-12.
- a) The Response states that the attached list includes the monthly number of disconnections for electric-only, gas-only and combination customer accounts. ACM assumes from this statement that the relevant electric-only numbers are listed in columns (a) and (b) and the relevant gas-only numbers are listed in columns (c) and (d). Please confirm that this understanding is correct.
- b) How are combination accounts listed among the various columns?
- c) Please explain the reasons for the significant variation in the monthly numbers of disconnections which vary from 2 to 10,755 for electric column (a) and from 49 to 766 for gas column (c).
- 12) Please provide the number of households (residential customers) that received assistance from a third party agency for whom LG&E assigned a pledge identification number for each month from January 1, 2008 through January 31, 2010. Please state the monthly amount of such funds.
- 13) Please refer to Response to ACM A-16. Please state the monthly number of customers who generated the late fee amounts provided in each of the tables (a-b), (c) and (d).
- 14) Please refer to Response to ACM A-16 and Response to Attorney General's Initial Request for Information A-3 (hereafter referred to as Response to AG).
- a) Please list the customer classes included in Response to AG A-3
- b) If the customer classes included in Response to AG A-3 only consist of the Residential class, please explain why the amounts listed in Response to AG A-3 from October 2008 to December 2009 do not agree with the amounts listed in Response to ACM A-16 (a-b).
- c) If the customer classes included in Response to AG A-3 include more than the Residential class, please explain why:
- i. the amount listed in Response to ACM A-16(a-b) for December 2008 (\$331,220) exceeds the amount listed for the corresponding month in Response to AG A-3 (\$308,890);
 - ii. the amount listed in Response to ACM A-16(a-b) for January 2009 (\$461,441) exceeds the amount listed for the corresponding month in Response to AG A-3 (\$438,134).

- 15) Please refer to Response to AG A-3. Please explain the reasons for the increase in late payments from 2008 to 2009.
- 16) Please provide the dollar amount LG&E has assessed residential customers in late payment penalties for each year 2008 and 2009 broken down by zip code.
- 17) Please refer to Response to AG A-5. Please describe in detail the FLEX option including who qualifies for this program. Please attach any policies or written description of this program.
- 18) Please refer to Response to AG A-1. Please provide a copy of the policies listed in Attachment 1, entitled Credit and Collection Manual Table of Contents.
- 19) Please state the amounts LG&E collected in each year for 2008 and 2009 for Demand Side Management Programs and provide a breakdown of how such funds collected were spent in each year.
- 20) Please state the amounts LG&E contributed in each year 2008 and 2009 to programs to assist customers in paying their bills.

Respectfully submitted,

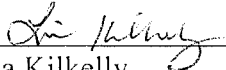


Lisa Kilkelly
Eileen Ordover
LEGAL AID SOCIETY, INC.
416 West Muhammad Ali Blvd. Suite 300
Louisville, Kentucky 40202
(502) 584-1254

Attorneys for ACM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Second Request For Information Of Association Of Community Ministries To Louisville Gas And Electric Company was served on the following parties on the 23rd day of March, 2010 by United States mail, postage prepaid.



Lisa Kilkelly

Lonnie E. Bellar
Vice President, State Regulation and Rates
E.ON U.S. Services, Inc.
220 West Main Street
Louisville, KY 40202

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

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

Robert W. Watt III
Monica H. Braun
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801

Steven A. Edwards, Esq.
Administrative Law Division
Office of the Staff Judge Advocate
1310 Third Avenue, Room 215
Fort Knox, KY 40121-5000

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

Dennis G. Howard II
Lawrence W. Cook
Paul D. Adams
Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Gardner F. Gillespie
Dominic F. Perella
Hogan & Hartson LLP
555 Thirteenth Street, N.W.
Washington, D.C. 20004

Robert A. Ganton, Esq.
Regulatory Law Office
U.S. Army Legal Services Agency
901 N. Stuart Street, Suite 525
Arlington, VA 22203-1837

Frank F. Chuppe
Wyatt Tarrant & Combs LLP
500 West Jefferson Street, Suite 2600
Louisville, KY 40202

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