

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS)	CASE NO.
ELECTRIC RATES AND FOR CERTIFICATES)	2016-00370
OF PUBLIC CONVENIENCE AND NECESSITY)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,
HARRISON, AND NICHOLAS COUNTIES, INC.

Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. ("CAC"), 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 on or before 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.

CAC 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 CAC 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, CAC 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 Malcolm J. Ratchford ("Ratchford Testimony"), page 6, lines 5–8.

a. Explain CAC's duties in administering the Home Energy Assistance ("HEA") Program.

b. State whether CAC is paid an administration fee. If yes, provide the amount.

c. State whether the HEA funds collected by KU are remitted to CAC to be used for energy assistance or remain with KU to apply to qualifying accounts at CAC's direction.

d. Explain how a customer qualifies to receive assistance through the HEA Program.

2. Refer to the Ratchford Testimony, page 9, line 12, through page 10, line 2.

a. For each month of the four months for which information is provided, state the number of customers who received assistance.

b. State whether the assistance payments were equal payments to each customer or if the amount of the payments varied to each customer.

c. Confirm that the referenced \$1,381,253.95 was paid directly to a utility. If this cannot be confirmed, explain.

d. Explain the difference between the \$1,381,253.95 paid in energy assistance and the \$800,717.08 paid to KU.

e. State how much of each amount listed in part d. above was HEA funds.

3. Refer to the Ratchford Testimony, page 14, lines 9–11. Explain who determines the subsidy amount per customer per month and how it is determined.

4. Refer to the Ratchford Testimony, page 16.

a. Refer to lines 1–2, wherein CAC requests the Commission approve the lowest possible increase in the basic service charge. Refer also to Kentucky Utilities Company's ("KU") Application, the Direct Testimony of Robert M. Conroy, pages 10–11. Beginning at the bottom of page 10, Mr. Conroy states "Unexpected surges in utility usage caused by extreme weather conditions can create additional hardships for customers who already have difficulty paying their utility bills in high-usage seasons and can cause other customers to have difficulties for the first time." Given this testimony, explain why the Commission should approve the lowest possible increase in the basic service charge.

b. Refer to lines 7–10. State the increase CAC proposes to the HEA fee to accomplish the requested increase in funding.

5. Refer to Case No. 2016-00371, Louisville Gas and Electric Company's ("LG&E") response to the First Information Request of the Association of Community Ministries, Items 2 and 3, Excel spreadsheet attachments, which indicate that customers receiving third-party assistance have a higher usage than the average residential customers in the LG&E service territory. State whether CAC believes this is true for the clients it serves in the KU territory.

6. State whether CAC has usage data which provides the average usage of KU's low-income customers. If yes, provide the average usage for KU's low-income customers.



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DATED MAR 17 2017
cc: All parties

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