

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC COMPANY AND)	
KENTUCKY UTILITIES COMPANY FOR A)	CASE NO.
CERTIFICATE OF PUBLIC CONVENIENCE AND)	2018-00005
NECESSITY FOR FULL DEPLOYMENT OF)	
ADVANCED METERING SYSTEMS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO ASSOCIATION OF COMMUNITY MINISTRIES, INC.

Association Of Community Ministries, Inc. ("ACM"), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on June 8, 2018. 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.

ACM 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 ACM 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, ACM 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 Michael Ashabraner (“Ashabraner Testimony”), pages 4-5, which states that Louisville Gas and Electric Company’s (“LG&E”) annual contribution of current shareholder funds to ACM is \$700,000; that ACM administered \$971,408 in utility assistance funds in 2016; and that \$463,986 of ACM’s utility assistance funds came from LG&E’s shareholder contribution. Provide the amount of LG&E’s annual contribution of shareholder funds to ACM in 2016 and, if the annual contribution of shareholder funds amount exceeds \$463,986, explain how ACM spent the funds in excess of the \$463,986.

2. Refer to ACM’s Motion to Intervene, paragraph 7, which acknowledges that LG&E is not proposing to change its service disconnection policies in conjunction with its

request to install Advanced Metering Systems (“AMS”). Also refer to LG&E’s Tariff Sheet 105(H), which sets forth the time periods and procedures for service disconnection for non-payment of bills. Last, refer to Ashabraner Testimony, pages 8-9, which discusses the potential for a larger number of disconnections occurring due to the ability for remote disconnection with AMS meters.

a. Explain why it is not reasonable for LG&E to implement tariff provisions that have been accepted by the Commission.

b. Explain whether ACM believes that a larger number of customers with overdue bills will be disconnected earlier in the collection cycle or whether ACM believes that a larger number of customers will be disconnected if AMS meters are installed.

c. Provide the basis for ACM’s scenario that the number of disconnections will double if AMS meters are approved by the Commission.

3. Provide the average length of time between when clients contact an ACM agency to schedule an appointment and the date of their appointment to request financial assistance with LG&E bills.

4. Refer to Ashabraner Testimony, page 10, which discusses how disconnections impact customers who face health risks without electric service. Also refer to LG&E Tariff Sheet 105(H), which provides that service will not be disconnected for 30 days from the original date of discontinuance for customers who provide medical certification that a household member has an illness or infirmity that will be aggravated if electric service is disconnected.

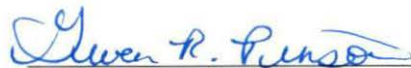
a. Explain the basis for ACM's statement that, if AMS is approved, more disconnections will occur for customers who face health risks without electric service.

b. Provide the percentage of clients for whom ACM agencies provide financial assistance with LG&E bills who are eligible under the medical certificate provision of LG&E Tariff Sheet 105(H), but have not yet presented a medical certificate to prevent or delay disconnection.

c. Provide the percentage of clients who receive financial assistance with LG&E bills from ACM agencies after the client presented a medical certificate to LG&E, thus preventing disconnection for an additional 30 days from the original disconnection notice under LG&E Tariff Sheet 105(H).

d. Explain whether ACM agencies prioritize or expedite appointments for financial assistance with LG&E bills for persons with illness or infirmity that will be aggravated without electric service.

5. Refer to Ashabraner Testimony, pages 12-13, regarding ACM's concerns regarding timing and notice of disconnection. Describe with specificity ACM's proposal for the terms of service for disconnection of service for non-payment of bills, should the Commission approve LG&E's request to install AMS.



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DATED **MAY 29 2018**

cc: Parties of Record

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