

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF HOME	)	
ENERGY ASSISTANCE PROGRAMS OFFERED	)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT	)	2019-00366
TO KRS 278.285(4)	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO DELTA NATURAL GAS COMPANY, INC.

Delta Natural Gas Company, Inc., (Delta), 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 January 3, 2020. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

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.

Delta 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 Delta 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, Delta shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm that Delta's HEA program is not a crisis program but instead provides recurring benefits to eligible enrolled applicants.

a. If confirmed, explain how the recurring benefits are determined for each participant (i.e., amount of total benefits available/slots available/months assistance is available, etc.).

b. If confirmed, further explain over what period of months recurring benefits are provided and whether the benefit level is different between months and consistent amongst participants.

2. Explain whether Delta has prioritization rules to determine which eligible applicants can receive HEA assistance or whether benefits are provided to eligible applicants on a first come first served basis. If there are prioritization rules, describe the prioritization rules in detail.

3. Refer to Delta's response to Commission Staff's First Request for Information (Staff's First Request), Item 3. Describe how Delta monitors Community Action Council for Lexington-Fayette, Bourbon, Harrison & Nicholas Counties' (CAC) administration of the HEA program and whether CAC provides daily, monthly, or annual reports to Delta with program participant and spending amounts.

4. Explain whether Delta receives daily, monthly, or annual reports from CAC and, if so, provide a copy of one daily, one monthly, and one annual report.

5. Explain whether Delta conducts or authorizes a third party to conduct an audit of CAC's administration of the HEA program to ensure funds are spent appropriately.

6. Refer to Exhibit A to Delta's response to Staff's First Request. Explain what percentage of budgeted or expended funds the most-recent program year's costs represent.

7. Refer to Delta's response to Staff's First Request, Item 1 and page 3 of Appendix C to the Commission's initiating Order. Provide an Excel spreadsheet with the same categories of information as provided in Appendix C for Delta for the five most-recent full program years.

8. Refer to Delta's response to Staff's First Request, Item 4.

a. Explain whether CAC receives a fixed fee for administering the HEA program and what the fee is based upon, such as a flat fee per participant or a percentage of funds expended.

b. Explain whether Delta reviews and approves CAC's proposed annual budget for HEA program variable expenses.

9. Refer to Delta's response to Staff's First Request, Item 7, which states that HEA program funds have not been fully expended in any of the past five years. Given that there have been excess funds in each of the past five years, explain why Delta has not raised the income eligibility requirement to higher than 110 percent. If Delta has considered raising the income eligibility requirement to higher than 110 percent of the poverty level, explain why the income eligibility requirement was not raised.

10. Refer to Delta's response to Staff's First Request, Item 7, which states that HEA program funds have not been fully expended in any of the past five years. Provide changes Delta believes are necessary to ensure the available funds are fully, but properly, expended for the benefit intended.

11. Identify any impediments or adverse consequences if the Commission raised Delta's income eligibility requirement from the current level to 150 percent, 200 percent, or some other higher increment of the poverty level.

12. Identify any impediments or adverse consequences if the Commission eliminated Delta's requirement that applicants must apply for Low Income Heating Assistance Program (LIHEAP) as one of the eligibility requirements for Delta's HEA program.

13. Identify any impediments or adverse consequences if the Commission eliminated Delta's requirement that applicants be recertified annually, and instead, Delta performed re-enrollment.

14. State whether the requirement that applicants participate in weatherization services have impacted eligibility for the HEA program and, if so, provide the number of

applicants that were ineligible for the HEA program due to the weatherization participation requirement.

15. Based upon its experience, explain what Delta believes are the ideal HEA eligibility requirements.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED DEC 16 2019

cc: Parties of Record

\*Honorable Allyson K Sturgeon  
Senior Corporate Attorney  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*John B Brown  
Chief Financial Officer  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

\*Duke Energy Kentucky, Inc.  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45202

\*Brooke Wancheck  
Asst. Counsel  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P. O. Box 14241  
Lexington, KY 40512-4241

\*Jenny Lowery  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

\*Lindsey Ingram  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Cheryl A MacDonald  
Columbia Gas of Kentucky, Inc.  
290 W. Nationwide Blvd.  
Columbus, OHIO 43215

\*Judy M Cooper  
Director, Regulatory Services  
Columbia Gas of Kentucky, Inc.  
2001 Mercer Road  
P. O. Box 14241  
Lexington, KY 40512-4241

\*Lawrence W Cook  
Assistant Attorney General  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Christen M Blend  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Post Office Box 16631  
Columbus, OHIO 43216

\*Justin M. McNeil  
Office of the Attorney General Office of Rate  
700 Capitol Avenue  
Suite 20  
Frankfort, KENTUCKY 40601-8204

\*Minna Sunderman  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

\*Debbie Gates  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

\*Kentucky Power Company  
Kentucky Power Company  
855 Central Avenue, Suite 200  
Ashland, KY 41101

\*Monica Braun  
STOLL KEENON OGDEN PLLC  
300 West Vine Street  
Suite 2100  
Lexington, KENTUCKY 40507-1801

\*Kentucky-American Water Company  
Kentucky-American Water Company  
2300 Richmond Road  
Lexington, KY 40502

\*Karen Greenwell  
Attorney  
Wyatt, Tarrant & Combs, LLP  
250 West Main Street  
Suite 1600  
Lexington, KENTUCKY 40507-1746

\*Honorable Mark R Overstreet  
Attorney at Law  
Stites & Harbison  
421 West Main Street  
P. O. Box 634  
Frankfort, KENTUCKY 40602-0634

\*Hector Garcia  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Post Office Box 16631  
Columbus, OHIO 43216

\*Kathie McDonald-McClure  
Attorney  
Wyatt, Tarrant & Combs, LLP  
2600 PNC Plaza  
500 West Jefferson Street  
Louisville, KENTUCKY 40202

\*Columbia Gas of Kentucky, Inc.  
Columbia Gas of Kentucky, Inc.  
290 W Nationwide Blvd  
Columbus, OH 43215

\*Delta Natural Gas Company, Inc.  
Delta Natural Gas Company, Inc.  
3617 Lexington Road  
Winchester, KY 40391

\*Kentucky Utilities Company  
Kentucky Utilities Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Rick E Lovekamp  
Manager - Regulatory Affairs  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Louisville Gas and Electric Company  
Louisville Gas and Electric Company  
220 W. Main Street  
P. O. Box 32010  
Louisville, KY 40232-2010

\*Robert Conroy  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Rocco O D'Ascenzo  
Duke Energy Kentucky, Inc.  
139 East Fourth Street  
Cincinnati, OH 45201

\*Roger McCann  
Executive Director  
Community Action Kentucky  
101 Burch Court  
Frankfort, KENTUCKY 40601

\*Sara Judd  
LG&E and KU Energy LLC  
220 West Main Street  
Louisville, KENTUCKY 40202

\*Sidney Gates  
Community Action Kentucky  
101 Burch Court  
Frankfort, KENTUCKY 40601