

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 LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company (LG&E) and Kentucky Utilities (KU) (jointly, LG&E/KU), pursuant to 807 KAR 5:001, are 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.

LG&E/KU shall make timely amendment to any prior response if they obtain 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 LG&E/KU fail or refuse to furnish all or part of the requested information, they 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, LG&E/KU 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 LG&E's HEA program is a crisis program and does not provide recurring benefits to eligible enrolled applicants.
2. Confirm that KU's HEA program is not a crisis program but instead provides recurring benefits to eligible enrolled applicants.
3. Explain whether LG&E's or KU's HEA programs have 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.
4. Provide a copy of any regular reports that Affordable Energy Corporation (AEC) routinely provides to LG&E. For example, if AEC provides weekly, monthly, and annual reports, provide one weekly, one monthly, and one annual report.

5. Provide a copy of any regular reports that Community Action Council for Lexington-Fayette, Bourbon, Harrison & Nicholas Counties' (CAC), or Community Action Kentucky (CAK) routinely provide to KU. For example, if CAC or CAK provides weekly, monthly, and annual reports, provide one weekly, one monthly, and one annual report.

6. Refer to LG&E/KU's response to Staff's First Request, Item 4. Provide copies of the July 1, 2019 agreements mentioned in the responses.

7. Refer to LG&E/KU's response to Staff's First Request, Item 5. To the extent possible, explain the reasons why fewer applicants were enrolled and received benefits than the total number of eligible applicants for LG&E's HEA program and for KU's HEA program.

8. Refer to LG&E/KU's response to Staff's First Request, Item 6.

a. Explain the determination or derivation of the Average Month Benefit Paid for LG&E and KU, respectively.

b. Provide the Average Monthly Benefit Paid for each month for 2017, 2018 and 2019 to-date for each program.

c. Provide the annual Average Monthly Benefit Paid for LG&E for years 2015-2017 and 2019 for the months that LG&E has the information.

d. For KU, provide the Average Monthly Benefit Paid for July-September of 2015, 2016, 2017, and 2018 and December through March of 2014-2015, 2015-2016, 2016-2017, 2017-2018, and 2018-2019.

9. Refer to LG&E/KU's response to Staff's First Request, Item 3.

a. Provide the annual cost of the outside independent audits.

b. Explain the scope and purpose of the audit including whether any review of internal controls for either the utilities, CAC, or CAK is conducted.

10. Identify any impediments or adverse consequences if the Commission raised the income eligibility requirement for LG&E or KU's HEA programs from the current level to 150 percent, 200 percent, or some other higher increment of the poverty level.

11. Provide the changes LG&E and KU, respectively, believe are necessary to ensure the available funds for each program are full, but properly, expended for the benefit intended.

12. Identify any impediments or adverse consequences if the Commission eliminated LG&E/KU's requirement that applicants must apply for Low Income Heating Assistance Program (LIHEAP) as one of the eligibility requirements for their respective HEA programs.

13. Refer to LG&E/KU's response to Staff's First Request, Item 5. Provide information for the past five program years. Identify any impediments or adverse consequences if the Commission eliminated LG&E/KU's requirement that applicants be recertified annually and instead perform re-enrollment.

14. State whether the requirement that applicants participate in weatherization services have impacted eligibility for the respective HEA programs and, if so, provide the number of applicants that were ineligible for the respective HEA programs due to the weatherization participation requirement.

15. Identify any impediments or adverse consequences if the Commission eliminated LG&E/KU's requirement that applicants apply for weatherization services as one of the eligibility requirements for the HEA programs.

16. Based upon their experience, explain what LG&E and KU believe are the ideal HEA eligibility requirements.



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DATED DEC 16 2019

cc: Parties of Record

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