COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	CASE NO.
COMPANY FOR AN ADJUSTMENT OF)	2012-00221
ITS ELECTRIC RATES)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO THE
COMMUNITY ACTION COUNCIL'S
INITIAL REQUEST FOR INFORMATION
DATED JULY 30, 2012

FILED: AUGUST 14, 2012

VERIFICATION

COMMONWEALTH OF KENTUCKY)	
)	SS:
COUNTY OF JEFFERSON)	

The undersigned, **Lonnie E. Bellar**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Lonnie E. Bellar

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of 2012.

Joseph Joseph (SEAL)

My Commission Expires:

VERIFICATION

COMMONWEALTH OF KENTUCKY)	SS
COUNTY OF JEFFERSON)	

The undersigned, **Sidney L. "Butch" Cockerill**, being duly sworn, deposes and says that he is Director – Operating Services and Business Process Management for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Sidney J. "Butch" Cockerill

Notary Public

My Commission Expires:

CASE NO. 2012-00221

Response to Community Action Council's Initial Requests for Information Dated July 30, 2012

Question No. 1

- Q-1. Please list the counties in which Kentucky Utilities Company operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.
- A-1. See attached Excel file.

The attachment is being provided in a separate file in Excel format.

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Question No. 2

- Q-2. Please list the Zip Codes in which Kentucky Utilities Company operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.
- A-2. See attached Excel file.

The attachment is being provided in a separate file in Excel format.

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Question No. 3

- Q-3. (a) Please provide the number of Kentucky Utilities residential customers who made at least one late payment in each of the years 2012, 2011, 2010, 2009, 2008, and 2007.
 - (b) Please additionally provide the information requested in (a) for each county in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
 - (c) Please additionally provide the information requested in (a) for each zip code in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
- A-3. a. KU began assessing late payment fees in April 2009, therefore, data for 2007, 2008 and January through March 2009 cannot be provided. The data provided represents KU residential customers who were assessed at least one late payment fee in the years 2009 2012. KU does not have a business reason to maintain ongoing files with the requested information segregated according to requested parameters. The attached information represents KU's effort to extract the data according to the requested parameters within the time allowed to respond to this request for information.
 - b. Please see response to part a and c of this question.
 - c. Please see attached Excel file.

The attachment is being provided in a separate file in Excel format. 2 Files

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Question No. 4

Responding Witness: Sidney L. "Butch" Cockerill

- Q-4. (a) How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2007, 2008, 2009, 2010, 2011, and through the most current date available in 2012?
 - (b) Of the accounts in the answer above, how many of those were shut off more than once for non-payment?

A-4. Please see table below.

	2007	2008	2009	2010	2011	2012*
Total residential accounts that were shut off:	68,652	70,945	33,524	65,412	76,434	41,964
Total accounts disconnected more than once:	unavailable	unavailable	5,093	13,270	16,027	7,553
*Contains data from January 1 through July 31.						

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Question No. 5

- Q-5. (a) How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2007, 2008, 2009, 2010, 2011, and through the most current date available in 2012 in each county in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
 - (b) How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2007, 2008, 2009, 2010, 2011, and through the most current date available in 2012 in each zip code in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
- A-5. a. KU's CIS archive data does not contain information to supply a county or zip code breakdown before 2008. Please see attached Excel file.
 - b. KU does not have a business reason to maintain ongoing files with the requested information segregated according to requested parameters. The attached information represents KU's effort to extract the data according to the requested parameters within the time allowed to respond to this request for information.

The attachment is being provided in a separate file in Excel format.

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Question No. 6

Responding Witness: Sidney L. "Butch" Cockerill

- Q-6. Please provide the average monthly bill for Kentucky Utilities residential customers (in dollars, not usage) for each year 2007, 2008, 2009, 2010, 2011, and thus far in 2012.
- A-6. Below is the average monthly invoice for Kentucky Utilities residential customers for each year from 2007 through July 2012.

Average Invoice for each year:

KU Customer	2007	2008	2009	2010	2011	2012 thru July
Residential	\$79.57	\$87.77	\$87.84	\$101.92	\$98.77	\$99.49

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Question No. 7

- Q-7. How many Kentucky Utilities customers paid a reconnect fee in the past 12 months?
- A-7. For the twelve months ended March 31, 2012, 70,329 reconnect fees were paid by KU customers.

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Question No. 8

- Q-8. Please provide the average residential Kentucky Utilities bill amount (in dollars, not usage) for each of the past 12 months.
- A-8. Below is a breakdown of the average residential Kentucky Utilities invoice amount for the past 12 months (Aug 2011 to July 2012).

	Average Invoice \$
Calendar Year/Month	\$
AUG 2011	117.39
SEP 2011	99.58
OCT 2011	69.93
NOV 2011	74.06
DEC 2011	94.31
JAN 2012	125.05
FEB 2012	110.90
MAR 2012	95.79
APR 2012	71.95
MAY 2012	76.82
JUN 2012	92.16
JUL 2012	122.54

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Question No. 9

Responding Witness: Lonnie E. Bellar

- Q-9. What is the correlation between the subject rate case and the acquisition of Kentucky Utilities Company by PPL Corporation?
- A-9. There is no correlation between the subject rate case and the acquisition of KU by PPL Corporation.