

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In The Matter Of:**

<b>APPLICATION OF LOUISVILLE GAS AND ELECTRIC</b>	)	
<b>COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC</b>	)	<b>CASE NO.</b>
<b>AND GAS RATES, A CERTIFICATE OF PUBLIC</b>	)	<b>2012-00222</b>
<b>CONVENIENCE AND NECESSITY, APPROVAL OF</b>	)	
<b>OWNERSHIP OF GAS SERVICE LINES AND RISERS,</b>	)	
<b>AND A GAS LINE SURCHARGE</b>	)	

**FIRST REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY  
MINISTRIES, INC. TO LOUISVILLE GAS AND ELECTRIC COMPANY**

In accordance with the procedural schedule established by the Commission by order entered July 18, 2012, Association of Community Ministries, Inc. ("ACM"), by counsel, requests the response of Louisville Gas and Electric Company ("LG&E") to the following Requests for Information.

**GENERAL INSTRUCTIONS**

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.

(6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

### **REQUESTS FOR INFORMATION**

1. Please provide the calculations used to derive the residential monthly impact figures and percentages of the requested increase as stated by Mr. Victor Staffieri in his testimony at pages 7 and 8, including the calculations for the usages of 1010 kWh of electricity and 57Ccf of gas.

2. For each month of the test year, please provide the average monthly electric usage for residential customers who received assistance from a third party agency during the test year. Please provide the supporting calculations for these figures.

3. For each month of the test year, please provide the average monthly gas usage for residential customers who received assistance from a third party agency during the test year. Please provide the supporting calculations for these figures.

4. For each month of the test year, please provide the average monthly electric usage for residential customers in the following zip codes:

40202  
40203  
40210  
40209  
40211  
40212  
40215  
40208

5. For each month of the test year, please provide the average monthly gas usage for residential customers in the following zip codes:

- 40202
- 40203
- 40210
- 40209
- 40211
- 40212
- 40215
- 40208

6. Utilizing the format in Attachment “A” to this First Request For Information, taken from Case No. 2009-00549, please provide the average residential gas bill for each month starting January 1, 2010 through July 31, 2012 generated by the average residential gas volume consumed broken down into its component parts (Customer Charge, Distribution Cost Component and Gas Supply Cost Component). Please specify the applicable rate of each component for each month.

7. Utilizing the format in Attachment “B” to this First Request For Information, taken from Case No. 2009-00549, please provide the average residential electric bill for each month starting January 1, 2010 through July 31, 2012 generated by the average residential electric usage broken down into its component parts (Customer Charge and Energy Charge). Please specify the applicable rate of each component for each month.

8. Please provide copies of the reports filed with the Public Service Commission pursuant to 807 KAR 5:006 of the number of disconnections for nonpayment of residential gas and electric customers for years ending June 30, 2010, 2011 and 2012. If 2012 is not yet available, please provide the date on which it is expected to be available and provide it at that time.

9. Please provide the annual number of disconnections for nonpayment of residential electric customers in the Louisville Metro area broken down by zip code for each calendar year

2010 and 2011. Please include zip codes 40118 and those beginning with 402 (40202 through 40299).

10. Please provide the annual number of disconnections for nonpayment of residential gas customers in the Louisville Metro area broken down by zip code for each calendar year 2010 and 2011. Please include zip codes 40118 and those beginning with 402 (40202 through 40299)

11. Please provide the number of residential customers that received assistance from a third party agency for each month from January 1, 2010 through June 30, 2012. Please state the monthly amount of such funds.

12. Please refer to the direct testimony of Lonnie Bellar at Page 4, Bellar Table I - Pro Forma Electric Rates of Return and Page 5, Table III - Pro Forma Gas Rates of Return. Provide the number of customers for each customer class listed in each of these tables as of the end of the Test Year.

13. At Exhibit 1 to the Direct Testimony of Chris Hermann, page 6, there appears a chart displaying the financial impacts of the Gas Service Riser and Customer Service Ownership Programs. Please provide a similar chart showing the costs of the replacement of the gas service risers without the costs related to taking ownership of and maintaining the gas service risers and customer service lines.

14. Please explain the differences between the total costs for each year listed in Hermann Exhibit 1 and the total annual revenue requirements for the gas line tracker listed in Bellar Exhibit 2 at page 2.

15. Please state the bill impact of replacing the gas service risers without assuming ownership of the risers and service lines for each of the classes for years 2013 through 2017.

16. Please describe all factors LG&E considered in its decision to propose a change of ownership of the gas service risers and customer service lines as part of the replacement program including any justification for the additional expenses of taking ownership of the risers and the resulting ongoing maintenance obligations.

17. Please see the Direct Testimony of J. Clay Murphy on page 5. What would be the estimated monthly bill impact on residential customers of the proposed change to recover the net uncollectible gas cost portion of bad debt through the GSC?

18. Please provide a chart showing for each of the years 2013 through 2017 the disaggregated and cumulative impacts in dollars on the monthly energy bill of a residential LG&E electric and gas customer using 1,010 kilowatt hours and 57 Ccf of gas of each of the following:

- (a) Proposed increase in electric base rate
- (b) Proposed increase in gas base rate
- (c) Proposed gas line tracker (including leak mitigation)
- (d) Environmental cost recovery surcharge approved in Case No. 2011-00162
- (e) DSM cost recovery mechanism approved in Case No. 2011 - 00134

19. Please refer to the Testimony of Chris Hermann at page 28, line 12 through page 29, line 1, wherein it is stated that LG&E has agreed to continue its current matching contribution to the ACM/Metro Match program through July 2014, and to make shareholder contributions to LG&E's HEA program of \$125,000 in 2011 and 2012.

- (a) Does LG&E plan any additional measures, within or beyond these timeframes, to mitigate the impact of the proposed base rate increases and gas line tracker on its low-income customers?

(b) If “yes,” please describe all such measures in detail.

Respectfully submitted,



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Counsel for ACM

Dated: July 31, 2012

**CERTIFICATE OF COMPLIANCE**

In accordance with Ordering Paragraph No. 10 of the Commission’s June 22, 2012 Order, I hereby certify that Association of Community Ministries, Inc.’s July 31, 2012 filing of the foregoing First Request for Information is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on July 31, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and one copy in paper medium are being mailed to the Commission on July 31, 2012.



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Eileen Ordovery  
Counsel for ACM

Louisville Gas and Electric Company  
Case No. 2009-00549

Average Residential Natural Gas Usage -- Each Month of Test Year

	RGS Customers	RGS Natural Gas Consumption (ccf)	Average Residential Consumption	Customer Change <sup>1</sup>	Distribution Cost	Distribution Revenue	Gas Supply Cost Component <sup>3</sup>	Gas Supply Cost Revenue	Total Average Residential Bill
Nov-08	288,729	13,415,898	46	\$ 8.50	\$ 0.15470	\$ 7.19	\$ 1.10867	\$ 51.51	\$ 67.20
Dec-08	289,610	33,803,249	117	\$ 8.50	\$ 0.15470	\$ 18.06	\$ 1.10867	\$ 129.40	\$ 155.96
Jan-09	290,751	41,869,084	144	\$ 8.50	\$ 0.15470	\$ 22.28	\$ 1.10867	\$ 159.65	\$ 190.43
Feb-09	289,692	37,993,325	131	\$ 9.50	\$ 0.21349	\$ 28.00	\$ 0.96425	\$ 126.46	\$ 163.96
Mar-09	289,438	27,072,161	94	\$ 9.50	\$ 0.21349	\$ 19.97	\$ 0.96425	\$ 90.19	\$ 119.66
Apr-09	296,207	18,279,826	62	\$ 9.50	\$ 0.21349	\$ 13.18	\$ 0.96425	\$ 59.51	\$ 82.19
May-09	288,580	7,616,544	26	\$ 9.50	\$ 0.21349	\$ 5.63	\$ 0.59913	\$ 15.81	\$ 30.94
Jun-09	290,497	4,946,544	17	\$ 9.50	\$ 0.21349	\$ 3.64	\$ 0.59913	\$ 10.20	\$ 23.34
Jul-09	288,258	3,992,292	14	\$ 9.50	\$ 0.21349	\$ 2.96	\$ 0.59913	\$ 8.30	\$ 20.76
Aug-09	291,602	3,782,571	13	\$ 9.50	\$ 0.21349	\$ 2.77	\$ 0.46914	\$ 6.09	\$ 18.36
Sep-09	288,902	3,847,786	13	\$ 9.50	\$ 0.21349	\$ 2.84	\$ 0.46914	\$ 6.25	\$ 18.59
Oct-09	291,175	6,296,124	22	\$ 9.50	\$ 0.21349	\$ 4.62	\$ 0.46914	\$ 10.14	\$ 24.26
Test Year Totals	3,483,441	202,915,404	58						

<sup>1</sup> Customer charge is applied only to RS customers.  
<sup>2</sup> February 2009 energy rate reflects the rate reduction that went into effect with service rendered on February 6, 2009.  
<sup>3</sup> The Gas Supply Cost component changed in November, February, May and August, and was billed on a service rendered basis. For purposes of this calculation, the average bill reflects the GSC component that went into effect in each of these months.

**Louisville Gas and Electric Company**  
Case No. 2009-00549

Average Residential Electric Usage -- Each Month of Test Year									
Customers	Electricity Consumption		Total	Average Residential Consumption	Customer Charge <sup>1</sup>	Energy Charge <sup>2</sup>	Energy Revenue	RSWH	RS
	RSWH	RS							
Nov-08	354,638	934,816	251,481,327	709	\$ 5.00	\$ 0.06406	\$ 45.43		
Dec-08	341,223	1,188,890	353,535,211	1,036	\$ 5.00	\$ 0.06406	\$ 66.37		
Jan-09	341,897	1,371,907	406,919,339	1,190	\$ 5.00	\$ 0.06406	\$ 76.24		
Feb-09	342,414	1,115,127	333,206,255	976	\$ 5.00	\$ 0.06303	\$ 61.54		
Mar-09	342,522	1,087,973	279,742,566	817	\$ 5.00	\$ 0.06303	\$ 51.48		
Apr-09	346,425	1,277,449	284,651,259	822	\$ 5.00	\$ 0.06303	\$ 51.79		
May-09	345,844	920,321	248,342,678	718	\$ 5.00	\$ 0.06303	\$ 45.26		
Jun-09	345,121	998,237	375,788,515	1,089	\$ 5.00	\$ 0.06303	\$ 68.63		
Jul-09	342,134	868,181	446,391,395	1,305	\$ 5.00	\$ 0.06658	\$ 86.87		
Aug-09	344,697	809,190	421,007,279	1,224	\$ 5.00	\$ 0.06658	\$ 81.48		
Sep-09	341,244	829,360	404,288,518	1,185	\$ 5.00	\$ 0.06658	\$ 78.88		
Oct-09	343,364	805,130	289,326,270	843	\$ 5.00	\$ 0.06658	\$ 56.10		
Test Year Totals	4,131,523	12,206,581	4,084,398,348	992					

<sup>1</sup> Customer charge is applied only to RS customers.

<sup>2</sup> February 2009 energy rate reflects the rate reduction that went into effect with service rendered on February 6, 2009.