

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

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

**SECOND REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Association of Community Ministries ("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 refer to LG&E's Response to the First Request for Information of Association of Community Ministries, Inc. Dated July 31, 2012 (hereafter referred to as "Response to ACM") A-1. Please confirm that the figures used by LG&E to calculate the average energy use of 1,010kWh per month are 4,216,187,376 kWh/4,173,222 customers. If these figures are not correct, please supply the actual figures used.
2. Please refer to Response to ACM A-3.
 - a) Please explain whether the figures provided are temperature normalized and adjusted for year-end customers, as is done in Conroy Exhibit R11, Page 1 of 7. (See the Response to ACM A-1 second paragraph in which the calculation to derive the average gas usage of 57 CCF is described).
 - b) If so normalized and adjusted, please provide the calculations used to derive these figures.
 - c) If not normalized and adjusted, please normalize and adjust the figures as done in Conroy Exhibit R11 and show the calculations used to derive these figures.
3. Please refer to Response to ACM A-4.
 - a) For each month of the test year please provide the average monthly electric usage for residential customers broken down by zip code for zip codes 40118 and those beginning with 402 (40202 through 40299). Please include the same information as provided in the Response to ACM A-4 and add the corresponding zip code numbers to the chart, as was done in Response to ACM A-5. Please include information for zip code 40208 which appears to be missing from A-5.
 - b) Please also provide the data requested in Excel format.
 - c) Please describe how the number of accounts per zip code was derived.
4. Please refer to Response to ACM A-5.
 - a) For each month of the test year please provide the average monthly gas usage for residential customers broken down by zip code for zip codes 40118 and those beginning with 402 (40202 through 40299). Please include the same information as provided in the Response to ACM A-5. In the chart originally provided, it appears that information for 40205, instead of 40208 was provided. Please provide the requested information for 40208.
 - b) Please describe how the number of accounts per zip code was derived.

- c) Please explain whether the figures provided in Response to ACM A-5 are temperature normalized and adjusted for year-end customers, as is done in Conroy Exhibit R11, Page 1 of 7. (See the Response to ACM A-1 second paragraph in which the calculation to derive the average gas usage of 57 CCF is described).
 - d) If the figures provided were normalized and adjusted, please provide the calculations used to derive these figures.
 - e) If the figures were not normalized and adjusted, please normalize and adjust the figures produced in Response to ACM A-5 as well as the additional figures requested in part (a) above as done in Conroy Exhibit R11 and show the calculations used to derive these figures.
 - f) Please also provide the data requested in Excel format.
5. Please refer to Response to ACM A-6.
- a) Please explain whether the figures provided are temperature normalized and adjusted for year-end customers, as is done in Conroy Exhibit R11, Page 1 of 7. (See the Response to ACM A-1 second paragraph in which the calculation to derive the average gas usage of 57 CCF is described).
 - b) If so normalized and adjusted, please provide the calculations used to derive these figures.
 - c) If not normalized and adjusted, please normalize and adjust the figures as done in Conroy Exhibit R11 and show the calculations used to derive these figures.
 - d) Please also provide the data requested in Excel format.
6. Please refer to Response to ACM A-8.
- a) 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, 2009 and 2008.
 - b) The Non-payment Disconnection/Reconnection Report filed by LG&E for year ending June 30, 2007 for gas customers was titled "Gas Customers" in contrast to the reports produced in Response to ACM A-8 which are entitled "Gas Customers Only." (See Attachment A to this Second Request for Information for a copy of 2007 Non-payment Disconnection/Reconnection Report.) Please explain the significance of this difference, including whether different numbers and types of accounts were included under "Gas Customers" and "Gas Customers Only." If so, provide the number of accounts under "Gas Customers" versus "Gas Customers Only" and a description of the types of accounts for each.

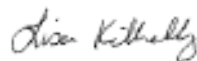
- c) The numbers of disconnections reported on the “Gas Customers” reports for year ending 2007 appear to be higher than for the “Gas Customers Only” reports produced in Response to ACM A-8. Please explain the reasons for these differences in numbers.
 - d) If the “Gas Customers” reports for year ending 2007 included accounts that are not reported under the “Gas Customers Only” reports produced in Response to ACM A-8, please explain where these accounts are now reported.
 - e) Please explain the note “(d)ata includes all residential disconnections including returned checks, diversion, nonpayment of bills and other which may skew the results” which appears on each report produced. Please include in the explanation how the results may be skewed, whether the numbers reported include disconnections for other than nonpayment issues and what types of disconnections are included under “other”.
 - f) The monthly numbers of disconnections of both gas and electric customers reported for the months of July 2009 through December 2009 reported on the Nonpayment Disconnection/Reconnection Report July 1, 2009 through June 30, 2010 do not agree with figures provided on the attached data response from the previous LG&E rate case, Case No 2009-00549 Response to Second Request for Information of Association of Community Ministries dated March 26, 2010, Response No. A-11. (See Attachment B) Please explain the difference in these numbers reported and which is more accurate.
7. Please refer to Response to ACM A-9.
- a) Please provide the total number of accounts per year for each zip code listed.
 - b) Do the numbers reported include the same types of accounts as are reported on the Disconnection/Reconnection reports filed with the PSC pursuant to 807 KAR 5:006? Please explain any differences.
 - c) Do the numbers include electric only and combined electric and gas customers? Please explain.
8. Please refer to Response to ACM A-10.
- a) Please provide the total number of accounts per year for each zip code listed.
 - b) Do the numbers reported include the same types of accounts as are reported on the Disconnection/Reconnection reports filed with the PSC pursuant to 807 KAR 5:006? Please explain any differences.
 - c) Do the numbers include gas only and combined gas and electric customers? Please explain.
 - d) Do the totals of numbers reported in Responses to ACM A-9 and A-10 comprise all residential disconnections for the time periods and zip codes specified? If not, please

provide the numbers of any other residential disconnections for these zip codes and time periods.

9. Please provide the total number of residential customers who had at least one bill paid by a third party agency for the following periods broken down by zip code.
 - a) 2010
 - b) 2011
 - c) 2012
10. Please provide the monthly number of disconnections for nonpayment of residential electric customers who received assistance from a third party agency from January 2010 to the present. Please include electric only and electric combined customers.
11. Please provide the monthly number of disconnections for nonpayment of residential gas customers who received assistance from a third party agency from January 2010 to the present. Please include gas only and gas combined customers.
12. Please refer to Response to ACM A-18(d). Please confirm that the attached is a complete and accurate copy of the Hearing Exhibit 4 for Case No. 2011-00162, referenced in LGE's response to ACM 1-18(d), but not attached thereto. (See Attachment C) If the attached is not a complete and accurate copy, please provide one.
13. Please refer to Response to ACM A-18(e), which requested certain bill impacts of the DSM cost recovery mechanism approved in Case No. 2011-00134, and LG&E's response.
 - a) Please explain how the document provided by LG&E may be used to calculate the requested bill impacts.
 - b) Please reconcile the results of these calculations with:
 - i. The testimony of Michael Hornung in Case No. 2011-134, where it is stated at page 14, line 15 through page 15, line 6, that the monthly bill impact of the new programs and enhancements approved in that case would be \$2.06, based on 1,000 kwh/month, and \$1.68/month, based on 70 ccf/month.
 - ii. The total DSM recovery components for residential electric and gas service, respectively, set forth in the tariff filed in this case.
 - c) Are the estimated bill impacts contained in the documents provided in Response to ACM A-18(e) still valid? Please explain. If there is a way to update the estimated bill impacts, please provide the calculations to do so.

14. Please refer to the Pledge Entry screen in the LGE-KU web portal through which authorized third-party assistance providers may make pledges on behalf of customers who cannot afford to pay their energy bills. Please provide the following information regarding the various types of assistance providers listed in the pull-down menu labeled “Type”:
- a) Description and name(s) of the assistance program(s), including source of funds, encompassed by the types “Crisis,” “Emergency” and “Subsidy.”
 - b) Please identify which of the listed “types” encompass pledges made under the Low Income Home Energy Assistance Program (LIHEAP), and explain what, if any, other assistance programs are encompassed by this “type.”
 - c) Please identify which of the listed “types” encompasses assistance provided through the Home Energy Assistance program funded with meter charge dollars, and explain what, if any, other assistance programs are encompassed by this “type.”
 - d) For each of the “types” Crisis, Emergency, Metro-match, Ministry, Subsidy and Winterhelp, please provide the following information for calendar years 2007 through 2011, broken down by zip code for the zip codes beginning 40202 through 40299, plus 40118. Please provide 2012 information to the extent available.
 - i. Total dollar amount paid
 - ii. Total number of households assisted

Respectfully submitted,



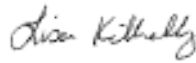
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Counsel for ACM

Dated: August 28, 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 August 28, 2012 filing of the foregoing Second 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 August 28, 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 August 28, 2012.



Lisa Kilkelly
Counsel for ACM

22200500 ✓

LOUISVILLE GAS AND ELECTRIC COMPANY
 NON-PAYMENT DISCONNECTION/RECONNECTION REPORT
 JULY 1, 2006 THROUGH JUNE 30, 2007
 GAS CUSTOMERS

807 KAR 5:006, SECTION 3(3)

COMPANY: LOUISVILLE GAS AND ELECTRIC COMPANY
 220 WEST MAIN STREET
 LOUISVILLE, KY 40202

Attachment
 "A"

Month	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Number Terminated	525	410	554	486	385	171	346	300	786	1,028	1,004	750
Highest \$ Amount Terminated	\$2,782.79	\$1,491.23	\$2,003.85	\$1,965.04	\$3,052.09	\$689.88	\$1,601.34	\$6,364.45	\$2,866.93	\$2,219.05	\$1,846.40	\$1,938.48
Lowest \$ Amount * Terminated												
Median \$ Amount Terminated	\$185.03	\$128.66	\$101.55	\$83.62	\$85.66	\$114.99	\$142.49	\$196.34	\$204.06	\$238.57	\$200.54	\$164.30
Average \$ Amount Terminated	\$270.75	\$196.78	\$133.20	\$124.99	\$127.98	\$128.24	\$177.11	\$279.72	\$285.44	\$300.48	\$258.96	\$222.27
Number Reinstated	179	147	193	179	146	77	173	142	356	392	290	193

* Note: Data includes all residential disconnections including returned checks, diversion, non-payment of bills and other which may skew the results
 Customer's account balance must be greater than or equal to \$25.00 to be reflected in a current disconnect schedule report

For information regarding this report, contact:
 Marty Reinert
 (502) 627-4173

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

Response to Second Request for Information of
Association of Community Ministries
Dated March 26, 2010

Question No. 11

Responding Witness: Butch Cockerill

Q-11. Please refer to Response to ACM A-12.

- a) The Response states that the attached list includes the monthly number of disconnections for electric-only, gas-only and combination customer accounts. ACM assumes from this statement that the relevant electric-only numbers are listed in columns (a) and (b) and the relevant gas-only numbers are listed in columns (c) and (d). Please confirm that this understanding is correct.
- b) How are combination accounts listed among the various columns?
- c) Please explain the reasons for the significant variation in the monthly numbers of disconnections which vary from 2 to 10,755 for electric column (a) and from 49 to 766 for gas column (c).

A-11. a) See response to part b) below.

- b) In the Company's CCS system, disconnects are counted at the meter level. Therefore, combination customers would be listed in both the electric columns (a) and (b) and gas columns (c) and (d), if both meters were disconnected.
- c) A portion of the response initially provided in ACM A-12 referenced above was incorrect. For clarity, the entire data table is provided below. The variation in the numbers of customers disconnected is due to several factors. First, the number of disconnects during winter months is significantly less than at other times during the year, due to colder temperatures. Conversely, as the weather improves, disconnects will increase (such as in May, 2009). In addition, disconnects in LG&E's service territory were reduced significantly in the early part of 2009 due to a combination of the ice storm and conversion to the new CCS system in April 2009.

<u>Year/Month</u>	(a) Number of Electric Residential Disconnects for Nonpayment	(b) Number of Electric Residential Disconnects for Nonpayment Who Received Assistance	(c) Number of Gas Residential Disconnects for Nonpayment	(d) Number of Gas Residential Disconnects for Nonpayment Who Received Assistance
2008/07	5,170	143	760	17
2008/08	5,229	141	504	6
2008/09	2,508	62	238	7
2008/10	6,931	579	573	35
2008/11	3,632	408	508	35
2008/12	3,882	364	362	18
2009/01	1,838	260	192	16
2009/02	1,604	220	153	4
2009/03	135	2	49	1
2009/04	1,102	116	62	3
2009/05	5,155	95	449	3
2009/06	5,522	55	766	7
2009/07	4,657	72	416	11
2009/08	4,948	60	384	6
2009/09	4,274	48	368	4
2009/10	3,284	29	209	1
2009/11	2,241	170	190	11
2009/12	1,893	102	193	4

*April 2009 through December 2009 column (a) and (b) incorrectly included both LG&E and KU in the response to ACM 1-12.

Settlement Agreement, Stipulation and Recommendation

**Louisville Gas and Electric Company
Environmental Cost Recovery Surcharge Summary
2011 Compliance Plan**

	2012	2013	2014	2015	2016
Total E(m) - (\$000)	\$23,185	\$70,517	\$117,511	\$206,543	\$237,839
12 Month Average Jurisdictional Ratio	87.20%	87.20%	87.20%	87.20%	87.20%
Jurisdictional E(m) - (\$000)	\$20,218	\$61,493	\$102,473	\$180,110	\$207,402
Forecasted Jurisdictional R(m) - (million)	\$956	\$1,013	\$1,038	\$1,077	\$1,131
Incremental Billing Factor	2.12%	6.07%	9.87%	16.72%	18.34%
Residential Customer Impact					
Monthly bill (1,000 kWh per month)	\$1.80	\$5.17	\$8.40	\$14.23	\$15.60

**Kentucky Utilities Company
Environmental Cost Recovery Surcharge Summary
2011 Compliance Plan**

	2012	2013	2014	2015	2016
Total E(m) - (\$000)	\$13,989	\$47,623	\$100,984	\$149,693	\$183,596
12 Month Average Jurisdictional Ratio	86.99%	86.99%	86.99%	86.99%	86.99%
Jurisdictional E(m) - (\$000)	\$12,169	\$41,426	\$87,844	\$130,215	\$159,707
Forecasted Jurisdictional R(m) - (million)	\$1,365	\$1,442	\$1,505	\$1,560	\$1,655
Incremental Billing Factor	0.89%	2.87%	5.84%	8.35%	9.65%
Residential Customer Impact					
Monthly bill (1,000 kWh per month)	\$0.69	\$2.22	\$4.52	\$6.46	\$7.47

LG&E - KU EXHIBIT 4