

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

**In the Matter of:**

<b>APPLICATION OF KENTUCKY UTILITIES</b>	)	<b>CASE NO.</b>
<b>COMPANY FOR AN ADJUSTMENT OF ITS</b>	)	<b>2014-00371</b>
<b>ELECTRIC RATES</b>	)	

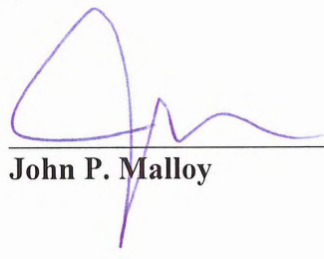
**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**TO**  
**CAC'S INITIAL REQUEST FOR INFORMATION**  
**DATED JANUARY 7, 2015**

**FILED: JANUARY 23, 2015**

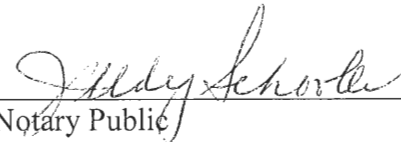
VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 ) SS:  
COUNTY OF JEFFERSON )

The undersigned, **John P. Malloy**, being duly sworn, deposes and says that he is Vice President, Customer Services for Kentucky Utilities Company and Louisville Gas and Electric 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.

  
\_\_\_\_\_  
**John P. Malloy**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 20th day of January 2015.

  
\_\_\_\_\_  
Notary Public (SEAL)

My Commission Expires:  
**JUDY SCHULER**  
**Notary Public, State at Large, KY**  
**My commission expires July 11, 2018**  
\_\_\_\_\_  
**Notary ID # 512743**

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated January 7, 2015**

**Case No. 2014-00371**

**Question No. 1**

**Responding Witness: John P. Malloy**

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 attachment being provided in Excel format.

# Attachment in Excel

The attachment(s)  
provided in separate  
file(s) in Excel format.

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated January 7, 2015**

**Case No. 2014-00371**

**Question No. 2**

**Responding Witness: John P. Malloy**

- 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 attachment being provided in Excel format.

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**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated January 7, 2015**

**Case No. 2014-00371**

**Question No. 3**

**Responding Witness: John P. Malloy**

- Q-3. Please list the census tracts for the areas in which Kentucky Utilities Company operates and the current number of residential customers in each census tract. If possible, provide this data in the form of an Excel spreadsheet
  
- A-3. Federal census tract data is not used in utility operations.

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated January 7, 2015**

**Case No. 2014-00371**

**Question No. 4**

**Responding Witness: John P. Malloy**

- Q-4. (a) Please provide the number of Kentucky Utilities residential customers who made at least one late payment in each of the years 2014, 2013, 2012, 2011, 2010, and 2009.
- (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.
- (d) Please additionally provide the information requested in (a) for each census tract in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
- A-4. (a) KU began assessing late payment fees in April 2009, therefore, data for January through March 2009 cannot be provided. However, the Excel attachment provided in response to part (b) reflects data from April 2009 to the end of 2014 for KU residential customers who were assessed one or more late payment fees.
- (b) See attachment provided in Excel format.
- (c) See attachment being provided in Excel format.
- (d) Federal census tract data is not used in utility operations.



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**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated January 7, 2015**

**Case No. 2014-00371**

**Question No. 5**

**Responding Witness: John P. Malloy**

- Q-5. (a) How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2009, 2010, 2011, 2012, 2013, and 2014?
- (b) Of the accounts in the answer above, how many of those were shut off more than once for non-payment?

A-5. See the table below.

	Number of Disconnects					
	2009	2010	2011	2012	2013	2014
(a) Total residential accounts that were shut off	33,524	65,412	76,434	75,595	82,702	81,844
(b) Total accounts disconnected more than once	5,093	13,270	16,027	15,349	17,178	16,968

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2014-00371**

**Question No. 6**

**Responding Witness: John P. Malloy**

- Q-6. (a) How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2009, 2010, 2011, 2012, 2013, and 2014 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 2009, 2010, 2011, 2012, 2013, and 2014 in each zip code in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
- (c) How many Kentucky Utilities residential accounts were shut off for non-payment in each year 2009, 2010, 2011, 2012, 2013, and 2014 in each census tract in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.
- A-6. (a)(b) See attachment being provided in Excel format.
- (c) Federal census tract data is not used in utility operations.

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2014-00371**

**Question No. 7**

**Responding Witness: John P. Malloy**

Q-7. Please provide the average monthly bill for Kentucky Utilities residential customers (in dollars, not usage) for each year 2009, 2010, 2011, 2012, 2013, and 2014.

A-7. Below is the average monthly invoice and consumption for KU residential customers for each year from 2009 through 2014.

KU Customer	2009	2010	2011	2012	2013	2014
Residential \$	\$87.84	\$101.92	\$98.77	\$96.93	\$107.75	\$118.72
Residential kWh		1,317	1,249	1,180	1,216	1,264

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2014-00371**

**Question No. 8**

**Responding Witness: John P. Malloy**

- Q-8. How many Kentucky Utilities customers paid a reconnect fee in the past 12 months?
- A-8. For the year ending December 31, 2014, 47,230 KU customers paid reconnect fees.

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2014-00371**

**Question No. 9**

**Responding Witness: John P. Malloy**

- Q-9. Please provide the average residential Kentucky Utilities bill amount (in dollars, not usage) for each of the past 12 months.
- A-9. Below is a breakdown of the average KU residential customer invoice amount for the past 12 months (Jan 2014 to Dec 2014).

Calendar Year/Month	Average Invoice \$	Average kWh
Jan 2014	\$174.79	1,984
Feb 2014	\$176.76	1,957
Mar 2014	\$144.76	1,555
Apr 2014	\$97.51	1,013
May 2014	\$84.97	840
Jun 2014	\$104.98	1,043
Jul 2014	\$118.96	1,230
Aug 2014	\$102.22	1,082
Sep 2014	\$110.18	1,168
Oct 2014	\$82.26	833
Nov 2014	\$94.84	990
Dec 2014	\$132.46	1,477

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2014-00371**

**Question No. 10**

**Responding Witness: John P. Malloy**

Q-10. Please provide the amounts of the monthly customer charge for Kentucky Utilities residential customers for each year 2009, 2010, 2011, 2012, 2013, and 2014. If possible, provide this data in the form of an Excel spreadsheet.

A-10. See attachment being provided in Excel format.



# Attachment in Excel

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