

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

**In The Matter Of:**

<b>APPLICATION OF LOUISVILLE GAS AND</b>	)	
<b>ELECTRIC COMPANY FOR AN ADJUSTMENT</b>	)	<b>CASE NO.</b>
<b>OF ITS ELECTRIC AND GAS RATES</b>	)	<b>2014-00372</b>

**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 the Responses to Numbers 2(a) and (b) of the First Request for Information of Association of Community Ministries (hereafter referred to as “ACM First Request”). Please provide the 2014 information that was not provided due to unavailability as soon as it is available.

2. Please refer to Schedule N (Electric) at Tab 66 of the Filing Requirements, Page 1 of 22, referred to in the Response to ACM First Request No. 7.

a. Please provide the rates used to calculate the Billing Factor amounts (FAC/DSM/ECR) and explain the basis for each rate.

b. For a residential electric customer, if the energy charge were to remain at \$0.08076 per kWh, what would the monthly Basic Service Charge need to be in order to collect the same allocated revenue requirement sought in this case? Please provide a bill impact summary using \$0.08076 per kWh and the necessary Basic Service Charge, similar to that provided in Schedule N at Tab 66 of the Filing Requirements, and as provided in Response to Metropolitan Housing Coalition Data Request No. 1-2(c).

c. Please confirm that the dollar and percentage increase in the residential electric Basic Service Charge resulting from LG&E’s last base rate case (Case No. 2012-00222) was \$2.25 (from \$8.50 to \$10.75) or 26%. If these figures are not confirmed, please provide the correct dollar and percentage increase.

d. For a residential electric customer, if LG&E were to increase the Basic Service Charge by the same percentage as in its last base rate case, what would the energy charge need to be in order to collect the same allocated revenue requirement sought in this case? Please provide a bill

impact summary using these figures similar to that provided in Schedule N at Tab 66 of the Filing Requirements, and as provided in response to Metropolitan Housing Coalition Data Request No. 1-2(c).

3. Please refer to Schedule N (Gas) at Tab 66 of the Filing Requirements, Page 1 of 9, referred to in the Response to ACM First Request No. 7.

a. Please provide the rates used to calculate the Billing Factor amounts (GSC/DSM/GLT) and explain the basis for each rate.

b. For a residential gas customer, if the Distribution Cost Component were to remain at \$0.26419 per 100 Cubic Feet, what would the monthly Basic Service Charge need to be in order to collect the same allocated revenue requirement sought in this case? Please provide a bill impact summary using \$0.26419 per 100 Cubic Feet and the necessary Basic Service Charge similar to that provided in Schedule N at Tab 66 of the Filing Requirements, and as provided in response to Metropolitan Housing Coalition Data Request No. 1-2(c).

c. Please confirm that the dollar and percentage increase in the residential gas Basic Service Charge resulting from LG&E's last base rate case (Case No. 2012-00222) was \$1 (from \$12.50 to \$13.50) or 8%. If these figures are not confirmed, please provide the correct dollar and percentage increase.

d. For a residential gas customer, if LG&E were to increase the gas Basic Service Charge by the same percentage as in its last base rate case, what would the Distribution Cost Component need to be in order to collect the same allocated revenue requirement sought in this case? Please provide a bill impact summary using these figures similar to that provided in Schedule N at Tab 66 of the Filing Requirements, and as provided in response to Metropolitan Housing Coalition Data Request No. 1-2(c).

4. Please refer to the Response to ACM First Request No. 7. Does LG&E have any estimate or projection of average residential electric and gas bills as described in Request No. 7 or average residential usage for each month of the forecast period? If so, please provide and describe the basis therefor.

5. Please refer to the Response to ACM First Request No. 8.

a. On Page 2 of 2 of the Attachment, why did the gas line tracker decrease to \$1.08 in May, 2014, and why is it projected to increase in the forecast year to \$3.63 as shown on Schedule N (Gas) at Tab 66 of the Filing Requirements, Page 1 of 9?

b. Please provide the information provided in Attachment to Response to Question No. 8 for January 2015 and February 2015 as soon as it becomes available.

6. Please refer to the Response to ACM First Request No. 9.

a. Please provide the same information as provided on the Non-Payment Disconnection/Reconnection Reports for the months of July 2014 through January 2015.

b. Are the customers whose disconnections are shown on the "Gas Customers Only" Reports customers who receive electric service from another provider? Please describe the type of customers who are gas only.

7. Please refer to the Response to ACM First Request No. 10.

a. Please confirm that the information provided on the Attachments to Questions 10(a) and (b) are for the fiscal years beginning in 2011, 2012 and 2013. If not, please describe the periods provided.

b. Please confirm that the information provided on the Attachment to Question 10(a) is for residential electric only and combined gas and electric accounts, and that the information on the

Attachment to 10(b) is residential gas only accounts. If not, please describe the information provided.

c. Please provide in Excel format the information requested in ACM First Request No. 10 with the following additional Jefferson County zip codes, which appear to be missing from the Attachments, and any other Jefferson County zip codes missing from the original response:

40018, 40023, 40025, 40027, 40041, 40056, 40059, 40109, and 40177.

d. If the total disconnections by zip code for fiscal years 2012 and 2013 provided in response to this Request do not agree with the numbers reported to the Public Service Commission, please explain any differences.

8. Please provide in Excel format the number of residential electric only and combined residential electric and gas accounts per zip code for each of the fiscal years beginning in 2011, 2012 and 2013 and for July 1, 2014 through January 31, 2015.

9. Please provide in Excel format the number of residential gas only accounts per zip code for each of the fiscal years beginning in 2011, 2012 and 2013 and for July 1, 2014 through January 31, 2015.

10. Please provide in Excel format the monthly number of LG&E residential accounts disconnected for nonpayment for each month starting July 2012 through January 2015 for the following zip codes: 40177, 40202, 40203, 40208, 40209, 40210, 40211, 40212, 40213, 40215, 40218 and 40219. Please provide this information in a manner that corresponds to the numbers reported on the disconnection reports provided in Response to ACM First Requests No. 9 and 10 for:

- a) residential electric customers
- b) residential gas customers

11. Please provide the number of residential accounts receiving third party assistance payments that (1) were disconnected for nonpayment in each of the fiscal years beginning in 2011, 2012, 2013 and 2014 through January 31, 2015 and (2) the number of those accounts in each fiscal year for which service was reinstated. Please provide this information in a manner that corresponds to the numbers reported on the disconnection reports provided in Response to ACM First Requests No. 9 and 10 for:

- a) residential electric customers
- b) residential gas customers.

12. Please provide the number of Winter Hardship reconnections processed in each of the fiscal years beginning in 2011, 2012, 2013, and 2014, broken down by Jefferson County zip code.

13. Please refer to the Response to ACM First Request No. 11. For each month provided in the Response (July 2012 through December 2014), please provide in Excel format a breakdown of the amount of third party assistance by type of assistance as listed on the LG&E/KU Web portal through which third party assistance providers make pledges.

14. For each of the types of assistance listed on the LG&E/KU Web portal please provide the following information for each month of calendar years 2012 through 2014 for Jefferson County broken down by zip code:

- a) Total dollar amount paid
- b) Total number of households assisted.

15. Please refer to the Response to ACM First Request No. 12. Does the Response provide information for the entire LG&E service territory? If not please describe the territory provided.

16. Please refer to the Responses to ACM First Request No. 11 and 12. In the Response to No. 11, the sums of the number of customers and amount of assistance are as follows:

	July – Dec. 2012	Jan. - Dec 2013	Jan. – Dec. 2014
Customers	24,871	51,482	55052
Amount	\$2,546,547.76	\$6,980,592.65	\$7,669,063.70

In Response to No. 12, the amounts of assistance agree with the amounts provided above, but the numbers of customers differ as shown below:

Customers	22,100	21,051	21,178
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Please explain the difference in the number of customers and if any information provided was incorrect, please provide the correct information in Excel format as requested in the First Request.

17. Please refer to the Attachment to the Response to ACM First Request No.13(d), page 13 of 19.

- a. Please provide the numbers of respondents making up the percentages listed.
- b. Please describe how the survey was conducted, including how the information was obtained, such as telephone or in person and the geographic area surveyed
- c. Please provide the demographics of the survey respondents overall including owner/renter, income, employment, ethnic group and average bill.
- d. Please provide a copy of the 2013 Bellamy Customer Satisfaction Research Study referenced on Page 11 of 19.

18. Please refer to the Response to ACM First Request No. 15(d). Please explain why LG&E is not able to provide a copy of the EEI report.

19. Please refer to the Response to ACM First Request No. 26. Please break down the numbers of LG&E Unique Accounts listed in the Response by zip code if available.

20. Please refer to the Responses to ACM First Request No. 26 and 27. Do both responses give the LG&E numbers for the entire LG&E service territory? If not please describe the territory provided.

21. Please refer to the Attachment to Response to ACM First Request No. 28(b).

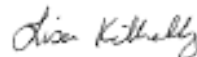
a. Please state which classes of customers are included the Attachment.

b. Please provide in Excel format the number of electronic payments made by LG&E residential customers and the total number of residential customers for each zip code provided in the Attachment to Response 28(b) for each of the years 2009 through 2014.

22. Please list all zip codes in which LG&E provides electric service and the current number of residential customers in each.

23. Please list all zip codes in which LG&E provides gas service and the current number of residential customers in each.

Respectfully submitted,



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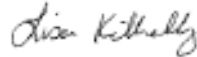
Counsel for ACM



Dated: February 6, 2015

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing Second Request for Information of Association of Community Ministries to Louisville Gas and Electric Company 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 February 6, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium is being Express mailed to the Commission on February 6, 2015.



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Lisa Kilkelly  
Counsel for ACM