

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

FIRST SET OF DATA REQUESTS OF  
METROPOLITAN HOUSING COALITION  
TO LOUISVILLE GAS & ELECTRIC COMPANY

Tom FitzGerald  
Kentucky Resources Council, Inc.  
P.O. Box 1070  
Frankfort, KY 40602  
(502) 875-2428  
FitzKRC@aol.com

Counsel for Intervenor  
Metropolitan Housing Coalition

Dated: January 8, 2015

## DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to

provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company" or "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.

### **INSTRUCTIONS**

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Metropolitan Housing Coalition. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are

requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**FIRST SET OF DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS AND ELECTRIC COMPANY BY METROPOLITAN HOUSING COALITION**

**Question 1-1:** With respect to the Direct Testimony of Paul W. Thompson regarding the gas riser replacement program, please explain:

**a.** How and upon whom (i.e. property owner, landlord, tenants) the Gas Tracker Fee is imposed in cases of multi-unit residential rental structures where the units are individually metered for gas service.

**b.** In the case of multi-unit residential structures, are more than one gas riser replacement made? Is a new riser required for each unit?

**c.** If the answer to Question 1-1a is that the fee is imposed on each rental unit, please explain how LG&E believes that such a fee imposition on a tenant is consistent with the Uniform Residential Landlord Tenant Act, KRS 383.595 et seq., which was adopted by Metro Louisville and is codified at J.C.O. 385.500 et seq.

**d.** Specifically, and without limitation, how is imposition of such fee on tenants consistent with KRS 383.595's requirement that the "landlord shall...maintain in good and safe working order and condition all electrical, plumbing, sanitary, heating, ventilating, air-conditioning, and other facilities and appliances...supplied or required to be supplied by him."

**e.** If a new riser is not needed for each unit in a multi-unit residential rental structure, how is the fee apportioned among the units?

**Question 1-2:** Please identify and provide, to the extent that it is not part of the filing, the justification for the increase in the fixed customer charges for electric and gas users, and provide:

**a.** The percentage increase in customer charges for the average user (1010 kWh/month), the low user (350 kWh/month) and the high user (2500 kWh/month), over the current customer charge.

**b.** The increase in monthly customer charges in dollar amounts for each category of user identified in Question 1-2a, if the Commission were to approve the requested increase in the monthly customer charge for being a gas or electric customer of LG&E.

**c.** The increase in monthly customer charges in dollar amounts for each category of user identified in Question 1-2a, if the amount sought in increased customer charge were instead reflected in a change in the volumetric rate.

**d.** Please explain whether the approach proposed in the filing, or that suggested in Question 1-2c, would be more likely to disincite the use of energy efficiency by customers to reduce their overall utility bills.

**Question 1-3:** Please identify any study or report justifying the proposed increase in service charge, and explain whether there are any costs formerly recovered as a component of the volumetric charges that have been shifted to the fixed service charge under the new tariffs?

**Question 1-4:** Please explain why LG&E is proposing to decrease the costs per CCF and kWh at the same time as proposing to increase the fixed meter cost – service charge, and explain:

**a.** Whether LG&E has evaluated or studied the impact of such a shift on low-income and fixed-income gas and electric customers.

**b.** Whether LG&E has evaluated or studied the impact of such a shift on motivation of average and high users to adopt energy efficiency measures.

**c.** Whether LG&E has evaluated or studied the impact of such a shift on the development of distributed renewable electricity, including ability of customers that have incorporated solar and other renewable distributed technology, to recover the costs associated with such investments.

**d.** Please provide any such studies, reports, or other evaluations requested in a-c.

**e.** Please explain how the shift of additional revenue recovery to fixed from volumetric charges will impact new and current energy efficiency investments by low, average, and high residential electric and gas users.

**Question 1-5:** Please explain how the proposed rate structure satisfies the Commission's recommendation in Case No. 2014-00003 that LG&E "shall

continue encouraging participation in programs to help low-income customers reduce energy consumption, thereby reducing monthly energy bills," when it appears that the monthly service charges will increase by 67% and 40.7% for electricity and gas, respectively, and the return on energy efficiency in lowering bills will decrease by 5.68% and 19.7% respectively.



---

Tom FitzGerald  
Kentucky Resources Council, Inc.  
P.O. Box 1070  
Frankfort, KY 40602  
(502) 875-2428  
FitzKRC@aol.com

*Counsel for Movant, Metropolitan  
Housing Coalition*

### **CERTIFICATE OF SERVICE**

This is to certify that electronic version of the First Set of Data Requests of Metropolitan Housing Coalition 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 January 8, 2015; 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 of the First Set of Data Requests of Metropolitan Housing Coalition to Louisville Gas and Electric Company will be mailed to the Commission on January 9, 2015.



---

Tom FitzGerald