

**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)	2016-00371
ELECTRIC AND GAS RATES)	

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

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Dated: January 11, 2017

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 LG&E proposes an increase in the fixed meter charge for electricity and natural gas residential customers and a decrease in the CCF, kWh and distribution cost rates for residential customers. With respect to these proposals:

a. 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.

b. Please provide 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.

c. Please provide the increase in monthly customer charges in dollar amounts (and by percentage) for each category of user identified in Question 1-2b, if the Commission were to approve the requested increase in the monthly customer charge for being a gas or electric customer of LG&E.

d. Please provide the increase in monthly customer charges in dollar amounts (and by percentage) for each category of user identified in Question 1-2b, if the amount sought in increased customer charge were instead reflected in a change in the volumetric rate.

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

f. Please provide any report or analysis on the effect that the proposed changes in rates and charges would have on those individuals and businesses that have made investments in energy efficiency, with regard to the time period needed to recover the customers' capital investment in such efficiency measures through energy usage charge savings.

g. Has LG&E evaluated, either internally or through a consultant report, the anticipated impact of the new proposed rate design on investments by customers in distributed solar or other forms of distributed generation?

Question 1-2: 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 1-3: 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 1-4: 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 for electricity and gas, respectively, and the return on energy efficiency in lowering bills will decrease.

Question 1-5: Please provide any report, analysis, or other documentation on the anticipated effect of the proposed change in rates and fixed charges on low-income and fixed-income customers.

Question 1-6: With respect to the proposed changes to the Gas Line Tracker fee, please explain how imposition of such a fee on natural gas customers who are renters can be harmonized with the Uniform Residential Landlord Tenant Act, which at KRS 383.595 that “A landlord shall...[m]aintain in good and safety working order and condition all electrical, plumbing, sanitary, heating, ventilating,, air-conditioning, and other facilities and appliances, including elevators, supplied or required to be supplied by him.”

Question 1-7: Is it the position of LG&E that the Gas Line Tracker Fee can be imposed on renters for improvements made on private property, absent an agreement by that renter to assume responsibility for payment? If so, explain how such a position conforms to KRS 383.595, which requires the landlord to “comply with the requirements of applicable building and housing codes materially affecting health and safety.”

Question 1-8: Has LG&E commissioned or undertaken any study on the whether there is a disproportionate impact of the Gas Line Tracker Fee on minority, disabled, and female-headed renting households; each of which classes are protected by federal, state, and local fair housing laws on public accommodations?

Question 1-9: Please explain whether the Gas Line Tracker fee distinguishes costs based on high- versus low density housing areas, or based on the length of gas line and maintenance and repair costs.

Question 1-10: Please provide the average cost for each foot of maintenance and repair for natural gas distribution lines, and for electric distribution lines.

Question 1-11: Please provide the number of electric, and of gas, meters in each census tract in the LG&E service area.

Question 1-12: Please explain how the costs provided in response to Question 1-9 are allocated among the residential customer base, and explain whether LG&E agrees that those areas that are higher density and with higher percentage of minority customers are subsidizing the costs of repair and maintenance of gas and electric lines for areas of lower density.

Question 1-13: Please produce a copy of any documents for the last three years (2014, 2015 and 2016) that LG&E has used to encourage lower energy consumption that mention that lower consumption would lower energy bills.

a. Within those documents, please identify the ones that are associated with the Demand Side Management cases.

b. Please provide any research or report commissioned by or relied upon by LG&E that concludes that lowering usage fees while increasing fixed costs will affect residential customer behavior so as to incentivize energy efficiency and less energy consumption.

Question 1-14: Regarding “Smart Meters,” please explain what benefit such meters have for persons who do not have a computer in their home compared to those who do have computer access from their home?

Question 1-15: Please explain why LG&E discontinued use of the pre-paid meter program, and whether installation of “Smart Meters” would make a pre-paid meter program possible again.

Question 1-16: Please explain whether the proposed “smart meters” would allow for automated cut- offs by LG&E.

Question 1-17: Please explain whether LG&E is contemplating a pre-paid meter program.

Question 1-18: Please explain what programs LG&E is contemplating using the Smart Meter technology.

Question 1-19: Please explain and provide any report or analysis supporting the proposition that Smart Meter technology is of benefit to the residential rental customer, and home-owning customer in the absence of time of day pricing.

Question 1-20: Please explain whether Smart Meter technology allows for automated charges of different costs per Kwh or CCF associated costs depending on the time of day? If so, please explain how such pricing would that affect elderly or disabled people who must stay inside on certain high temperature days of the year for health reasons.

Question 1-21: The Metropolitan Housing Coalition represents non-profit developers who wish to incorporate distributed solar power into developments. Does LG&E allow credits generated for net-metered electricity produced on one site to be credited towards bill payment of another site they own and operate?

Question 1-22: Please compare the average monthly bill for the average WE CARE recipient during 2016, with what the bill would be for that average customer if the proposed rate structure is approved by the Commission.

Respectfully submitted,



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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 11, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six (6) copies in paper medium of the First Set of Data Requests of Metropolitan Housing Coalition to Louisville Gas and Electric Company will be filed with the Commission within two days of January 11, 2017.



Tom FitzGerald