

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

ELECTRONIC APPLICATION OF LOUISVILLE)	
GAS AND ELECTRIC COMPANY FOR AN)	CASE NO.
ADJUSTMENT OF ITS ELECTRIC AND GAS)	2016-00371
RATES AND FOR CERTIFICATES OF PUBLIC)	
CONVENIENCE AND NECESSITY)	

FIRST REQUESTS FOR INFORMATION OF
ASSOCIATION OF COMMUNITY MINISTRIES, INC.

In accordance with the procedural schedule established by the Commission by Order dated December 13, 2016, Association of Community Ministries, Inc. (“ACM”), by counsel, hereby requests the response of Louisville Gas and Electric Company (“LG&E”) to the following.

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 provide the calculations used to derive the average percentage and dollar increases in monthly residential electric and gas bills as stated by Robert M. Conroy in his Testimony (hereafter referred to as Conroy Testimony) at page 4, lines 13 through 17, including the calculations for the usages of 957 kWh of electricity and 55 Ccf of gas.

2. Please provide in Excel format the average annual usage for LG&E residential customers for each of the following years, 2015 and 2016, and provide the supporting calculations for these figures. Please provide this information for:

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

3. Please provide in Excel format the average annual usage for LG&E residential customers for each of the following years, 2015 and 2016, who received assistance from a third party agency during the calendar year in question. Please provide the supporting calculations for these figures. Please provide this information for:

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

4. Please provide in Excel format the average annual usage for LG&E residential customers by zip code for each of the following years, 2015 and 2016, and provide the supporting calculations. Please provide this information for:

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

5. Utilizing the format in Attachment A to this First Request For Information, taken from Case No. 2014-00372 (Attachment to Response to LGE ACM-1 Question No. 5), please provide the average residential gas bill for each month starting January 1, 2015 through December 31, 2016 generated by the average residential gas volume consumed broken down into its component parts (Customer Charge, Distribution Cost Component and Gas Supply Cost Component). Please specify the applicable rate of each component for each month. Please also provide the data in Excel format.

6. Utilizing the format in Attachment B to this First Request For Information, taken from Case No. 2014-00372 (Attachment to Response to LGE ACM-1 Question No. 6), please provide the average residential electric bill for each month starting January 1, 2015 through December 31, 2016 generated by the average residential electric usage broken down into its component parts (Customer Charge and Energy Charge). Please specify the applicable rate of each component for each month. Please also provide the data in Excel format.

7. Please provide the projected average residential electric and gas bills, respectively, for each month of the forecast period that would be incurred by the average residential customer, broken down into the requested customer and energy charges and projected environmental, DSM and gas line tracker charges. Please provide the supporting calculations. Please provide this information by using the format in Attachment C to this First Request For Information, taken from Case No. 2014-00372 (Attachments 1 and 2 to Response to LGE ACM-2 Question No. 4).

8. Please provide the average residential electric and gas bills, respectively, for each month starting January 1, 2015 through December 31, 2016 incurred by the average residential customer, broken down into the actual customer and energy charges and environmental, DSM and

gas line tracker charges. Please provide the supporting calculations. Please provide this in Excel format.

9. Please provide the following information pertaining to non-payment disconnection/reconnection reports filed with the Public Service Commission.

- a) Please provide copies of the non-payment disconnection/reconnection reports filed by LG&E with the Public Service Commission for the July 1, 2014 through June 30, 2015 period and the July 1, 2015 through June 30, 2016 period.
- b) Please confirm that numbers of terminations and reinstatements on the electric customers reports consist of terminations and reinstatements of residential electric only and combined gas and electric customers, and that the corresponding numbers on the gas customers reports consist of terminations and reinstatements of residential gas only customers. If not confirmed, please provide an explanation of what information is included on each.
- c) If LG&E has made any changes to the information provided or manner of reporting on the reports requested in part (a) above, as compared to reports for previous reporting periods, please explain the reasons for such changes.
- d) For each of the reports requested in part (a) above pertaining to electric customers, please break down the numbers of customers terminated and numbers of customers reinstated into electric only and combined gas and electric customers.

10. Please provide in Excel format a breakdown by zip code of (1) the number of residential accounts in the LG&E service territory disconnected for nonpayment and (2) the

number of those accounts for which service was reinstated for each of the years 7/1/2014 through 6/30/2015 and 7/1/2015 through 6/30/2016. Please provide this information for:

- a) residential electric only customers
- b) residential combined electric and gas customers
- c) residential gas only customers

11. Please provide the number of LG&E residential customers that received assistance from a third party agency for each month from January 1, 2015 through December 31, 2016. Please state the monthly amount of such funds.

12. Please provide in Excel format a breakdown by zip code of the number of residential customers in the LG&E territory who had at least one bill paid by a third party agency and the amount of assistance paid. Please provide this information for the following years:

- a) 2015
- b) 2016

13. Please provide in Excel format (1) the number of residential accounts receiving third-party assistance in the LG&E service territory disconnected for nonpayment and (2) the number of those accounts for which service was reinstated for each of the years 7/1/2014 through 6/30/2015 and 7/1/2015 through 6/30/2016. Please provide this information for:

- a) residential electric only customers
- b) residential combined electric and gas customers
- c) residential gas only customers

14. Please provide the number of Winter Hardship reconnections in LG&E territory for each of the years 7/1/2014 through 6/30/2015 and 7/1/2015 through 6/30/2016 broken down by zip code.

15. Please refer to the Conroy Testimony at page 29, lines 12 through 18 and at page 53, lines 11 through 18.

- a) How many electric meters are currently subject to the HEA charge?
- b) How many electric meters would be subject to the HEA charge under the proposed deletion of “per meter” from the tariff?
- c) How many gas meters are currently subject to the HEA charge?
- d) How many gas meters would be subject to the HEA charge under the proposed deletion of “per meter” from the tariff?
- e) For each month of the test period, please provide a comparison of what projected revenue from the HEA charges would be under the current tariff language and the proposed tariff language. Please provide the supporting calculations. Please provide this information separately for electric and gas.
- f) Assuming an HEA charge of 25 cents, under LG&E’s proposal to delete the “per meter” language, would a residential customer who has both gas and electric service continue to pay the HEA charge on each meter, for a monthly total of 50 cents? If not, please explain.

16. Please refer to the testimony of John P. Malloy (hereinafter “Malloy Testimony”) at page 24, line 17 through page 25, line 2 and page 25, lines 8 through 12, where some of the purported benefits to customers of full AMS deployment are discussed.

- a) Has LG&E investigated the extent to which its low income customers have reasonable access to the technology needed to take full advantage of these benefits? If so, please provide all documents related to that investigation. If not, please explain why not.

- b) Have the Companies investigated the extent to which low-income utility customers in other jurisdictions deploying smart meters have participated in these or similar benefits, where available? If so, please provide all documents related to that investigation. If not, please explain why not.

17. Please refer to the Malloy Testimony at page 25, lines 2 through 3, where it is stated that “full AMS deployment will enable the Companies to develop time-of-day or more dynamic rate structures...”

- a) Do the Companies in fact intend to develop such rate structures for residential service in the LG&E service territory?
- b) If so, (i) what is the projected time frame for their development and (ii) are they anticipated to be voluntary?

18. Please refer to page 8 of the Advanced Metering Systems Business Case, Exhibit JHM-1, where it is stated “PPL Electric Utilities (PPLEU), a utility serving customers in Pennsylvania...is currently preparing to deploy... advanced meters in its service territory. The Company is leveraging lessons learned and best practices from PPLEU for successful deployment in Kentucky.”

- a) Has PPLEU yet obtained regulatory approval for the referenced deployment? Please provide the name of the regulatory body, caption and docket number for the pertinent regulatory proceeding(s).
- b) Will PPLEU utilize remote disconnection for nonpayment by residential customers? If so, what policies, procedures and safeguards has PPLEU developed?

- c) Have the Companies examined the extent to which state laws, regulations and regulatory precedent relevant to disconnection of residential customers for nonpayment may differ between Pennsylvania and Kentucky? If so, please provide all analyses, reports and related documents.

19. Please provide an update on the Companies' investigation of "Predictive Usage Alerts" and "Pick Your Own Due Date," as referenced on pages 26 - 27 of the Advanced Metering Systems Business Case, Exhibit JHM-1, including plans and timetables for offering these programs to residential LG&E customers.

20. Please refer to section 7.1.1.1, entitled "Customer Empowerment via ePortal," on page 32 of the Advanced Metering Systems Business Case, Exhibit JHM-1, which states "[p]reliminary opt-in program results show that active users...draw insights from their consumption patterns and adjust their behavior to save energy. The Company conservatively projects a 3% energy savings for those making proactive changes... This represents savings of approximately \$166.3 million over 20 years."

- a) Please explain in detail how the Companies arrived at the 3% figure.
- b) Please describe in detail the particular "proactive changes" an average LG&E residential customer would need to make in order to attain the projected 3% energy savings.
- c) Please provide the energy savings, expressed as a percentage, attained by participants in the AMS opt-in program to date, broken out for the LG&E and KU service territories.
- d) Please provide the number of AMS opt-in program participants in the LG&E service territory who attained energy savings, broken down by zip code, in

Excel format.

- e) Of the participants included in the response to (d), how many had a bill paid by a third party assistance provider during either 2015 or 2016?
- f) Please provide a copy of the 2013 Smart Grid Consumer Collaborative Report referenced in section 7.1.1.1, footnote 20.

21. Please refer to the chart on page 157 of Exhibit JPM -1 (AMS Business Case Appendix A-5), entitled “ePortal Customer Benefits Value Levers,” specifically the column “Calculation Assumptions,” which posits that 48% of customers will use the portal at least once, and that 36% of those customers will benefit from the energy granularity of AMS and achieve energy savings.

- a) Please confirm that, calculating 36% of 48%, 17% of customers are projected to achieve energy savings.
- b) Please confirm that this chart is limited to the residential class. If not, please disaggregate all figures by class.

22. Please refer to the Malloy testimony at page 21, line 1, where it is stated that the Companies have enrolled over 4,000 customers in the AMS Customer offering since enrollment began in June 2015.

- a) How many of these are LG&E customers?
- b) Please provide a breakdown by zip code of LG&E customers so enrolled.
- c) How many LG&E customers so enrolled had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of customer enrollments in June 2015 and ending December 31, 2016?

23. Please refer to the Malloy testimony at page 21, lines 4 - 7, where it is stated that customers participating in the AMS Customer offering span “various...socioeconomic segments throughout the Companies Kentucky service territories.” Please provide the data underlying this assertion, disaggregated for the LG&E service territory by zip code.

24. Please provide the survey instrument used by Bellomy Research to conduct the Advanced Meter Service Participant Study attached as Appendix A-1 to Exhibit JHM-1 (hereinafter “AMS Participant Study”).

25. Please refer to the chart entitled “Response Rate Summary” on page 59 of Exhibit JMH-1 (Appendix A-1), concerning the AMS Participant Study.

- a) For the 1,010 emails delivered to LG&E customers, please provide a breakdown of residential customers by zip code.
- b) Of the 1,010 emails delivered to LG&E customers, how many were delivered to customers who had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of AMS customer enrollments in June 2015 and ending December 31, 2016?
- c) For the 179 surveys completed by LG&E customers, please provide a breakdown of residential customers by zip code.
- d) Of the 179 surveys completed by LG&E customers, how many were completed by customers who had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of AMS customer enrollments in June 2015 and ending December 31, 2016?

26. Please refer to the graph entitled “Steps Taken to Save Energy” on page 87 of Exhibit JMH-1 (Appendix A-1), concerning the AMS Participant Study. For each energy saving step included in the graph, please:

- a) provide the number of LG&E customer respondents taking that step, broken down by zip code;
- b) provide the number of LG&E customer respondents taking that step, broken down by the income levels used by the AMS Participant Study to collect demographic information; and
- c) indicate how many of the LG&E customer respondents taking that step had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of AMS customer enrollments in June 2015 and ending December 31, 2016.

27. Please refer to the graph entitled “Appliances Purchased” on page 88 of Exhibit JMH-1 (Appendix A-1), concerning the AMS Participant Study. For each appliance included in the graph (including “other”), please:

- a) provide the number of LG&E customer respondents purchasing that appliance, broken down by zip code;
- b) provide the number of LG&E customer respondents purchasing that appliance, broken down by the income levels used by the AMS Participant Study to collect demographic information; and
- c) indicate how many of the LG&E customer respondents purchasing that appliance had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of AMS customer

enrollments in June 2015 and ending December 31, 2016.

28. Please refer to the graph entitled “Type of Thermostat Purchased” on page 89 of Exhibit JMH-1 (Appendix A-1), concerning the AMS Participant Study. For each type of thermostat (including “other”), please:

- a) provide the number of LG&E customer respondents purchasing that type of thermostat, broken down by zip code;
- b) provide the number of LG&E customer respondents purchasing that type of thermostat, broken down by the income levels used by the AMS Participant Study to collect demographic information; and
- c) indicate how many of the LG&E customer respondents purchasing that type of thermostat had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of AMS customer enrollments in June 2015 and ending December 31, 2016.

29. Please refer to the graph entitled “Energy Efficiency Program Enrollment” on page 90 of Exhibit JMH-1 (Appendix A-1), concerning the AMS Participant Study. For each energy efficiency program (including “other”), please:

- a) provide the number of LG&E customer respondents enrolling in that program, broken down by zip code;
- b) provide the number of LG&E customer enrolling in that program, broken down by the income levels used by the AMS Participant Study to collect demographic information; and
- c) indicate how many of the LG&E customer respondents enrolling in that program had a bill payment made by a third-party assistance provider during

the period beginning twelve months prior to the start of AMS customer enrollments in June 2015 and ending December 31, 2016.

30. Please provide the following information regarding use of the on-line My Account self-service site by LG&E's residential customers:
- a) The total number of unique residential My Account registrants as of December 31, 2016, broken down by zip code, in Excel format.
 - b) Number of accounts in (a) belonging to customers who had a bill paid by a third party assistance provider in either 2015 or 2016.
 - c) Number of accounts in (a) belonging to customers who were disconnected for nonpayment during either of the years 7/1/2014 – 6/30/2015 or 7/1/2015 – 6/30/2016.
 - d) For each of the years 2015 and 2016, the total number of bill payments made via My Account, broken down by zip code, in Excel format.
 - e) Number of payments in (d) made by customers who had a bill paid by a third party assistance provider in either 2015 or 2016.
 - f) Number of customers who signed up for budget billing via My Account.
31. Please provide the following information for each of the years 2015 and 2016:
- a) Number of residential LG&E customers who used the on-line feature to start or move service, broken down by zip code.
 - b) Of the number in (a), number of customers who had a bill paid by a third party assistance provider in either year.
 - c) Number of residential customers who used the on-line feature to stop service, broken down by zip code.

- d) Of the number in (c), number of customers who had a bill paid by a third party assistance provider in either year.

32. Please refer to the Malloy testimony at page 14, lines 10 – 14, regarding the introduction of Outage Texting and My Notifications. For each of these offerings, respectively, please provide the following information concerning residential customers in the LG&E service territory:

- a) Total number of customers who have signed up for the service through December 31, 2016, broken down by zip code.
- b) Of the number in (a), number of customers who had a bill paid by a third party assistance provider in either 2015 or 2016.

33. Please refer to page 17, lines 21 - 23 of the Malloy Testimony, concerning the Companies' "comprehensive look at smart meters when federal funding was available for smart-grid deployments under the American Reinvestment and Recovery Act," in which it was assisted by Accenture Consulting. Please provide the resulting analysis, conclusions and report(s).

34. Please provide copies of all studies, analyses, reports or other resources the Companies have produced, consulted or reviewed regarding the impacts of AMS deployment on low income utility customers. Please include documents regarding the experience in other jurisdictions that have deployed smart meters as well as those projecting impacts in the Companies' service territories.

35. Please confirm that LG&E intends to utilize the remote disconnection capabilities of AMS to disconnect residential electric accounts for non-payment, but not residential gas accounts. If this is not confirmed, please explain.

36. When does LG&E intend to implement remote service switching to disconnect residential customers in Jefferson County for nonpayment?
37. Please provide breakdowns of, respectively:
- a) the current cost of disconnecting a residential LG&E electric-only customer for non-payment;
 - b) the current cost of disconnecting a residential LG&E combined (gas and electric) customer for non-payment;
 - c) the projected cost of disconnecting a residential LG&E electric-only customer for nonpayment upon implementation of remote disconnection; and
 - d) the projected cost of disconnecting a residential LG&E combined customer for nonpayment upon implementation of remote disconnection.
38. Please provide breakdowns of, respectively:
- a) the current cost of reconnecting a residential LG&E electric-only customer disconnected for non-payment;
 - b) the current cost of reconnecting a residential LG&E combined (gas and electric) customer disconnected for non-payment;
 - c) the projected cost of reconnecting a residential LG&E electric-only customer disconnected for nonpayment upon implementation of remote reconnection; and
 - d) the projected cost of reconnecting a residential LG&E combined customer disconnected for nonpayment upon implementation of remote reconnection of electric service.

39. Please provide copies of all policies, procedures and safeguards LG&E will implement regarding the use of remote service switching to disconnect residential accounts for nonpayment, and subsequently reconnecting them.

40. Please refer to the Malloy Testimony at page 17, lines 8 -15, where projected savings over the 20-year life of the fully deployed metering system are discussed.

- a) Please provide a breakdown of the cited benefits between the LG&E and KU service territories.
- b) For the LG&E service territory, please indicate in dollars and as a percentage of the total the extent to which the cited savings will result from remote (as opposed to manual) disconnection for nonpayment of residential customers.
- c) Please explain the calculation used to arrive at the figures in (b).

41. In reference to the residential electric accounts included in each of the reports requested in Information Request 9, above, please provide the following:

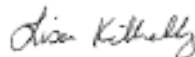
- a) Number of accounts disconnected after the disconnection date specified in the 10-day notice provided the customer pursuant to LG&E's Terms and Conditions and 807 KAR 5:006 Section 15(1)(f)(1), broken down by zip code.
- b) Average number of days elapsing between the disconnection date specified in the 10-day notice and the actual date of disconnection, broken down by zip code.
- c) Median number of days elapsing between the disconnection date specified in the 10-day notice and the actual date of disconnection, broken down by zip code.

42. For each of the years 2015 and 2016, please provide the number of accounts for which a payment was made by a third-party assistance provider after the disconnection date specified in the 10-day notice but before service was disconnected.

43. Please refer to page 26 of the Malloy testimony at lines 3 through 5, where it is stated that “the ability to remotely switch service can help avoid injuries” and that “[s]ince 2011, Field Services Personnel have encountered about 80 physical threats related to disconnections per year on average.”

- a) Please define what is meant by “physical threat” in this context.
- b) How many injuries have occurred during this time period?

Respectfully submitted,



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Counsel for ACM

Dated: January 11, 2017

Attachment A
First Request for Information of Association of Community Ministries to Louisville Gas and Electric Company, Question No. 5
Case No. 2016-00371

Attachment to Response to LGE ACM-1 Question No. 5									
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Conroy									
Louisville Gas and Electric Company									
Case No. 2014-00372									
Average Residential Natural Gas Usage									
For the Period August 1, 2012 through December 31, 2014									
Date	RGS Customers	RGS Natural Gas Consumption (ccf)	Average Residential Consumption	Customer Charge	Distribution Cost Component	Distribution Revenue	Gas Supply Cost Component	Gas Supply Cost Revenue	Total Average Residential Bill
8/1/2012	290,646	3,329,648	11.46	\$12.50	\$0.22396	\$2.57	\$0.39627	\$4.54	\$19.61
9/1/2012	289,427	3,730,004	12.89	\$12.50	\$0.22396	\$2.89	\$0.39627	\$5.11	\$20.49
10/1/2012	290,064	5,743,591	19.80	\$12.50	\$0.22396	\$4.43	\$0.39627	\$7.85	\$24.78
11/1/2012	290,696	16,125,523	55.47	\$12.50	\$0.22396	\$12.42	\$0.42501	\$23.58	\$48.50
12/1/2012	291,185	22,806,153	78.32	\$12.50	\$0.22396	\$17.54	\$0.42501	\$33.29	\$63.33
1/1/2013	292,720	36,257,777	123.87	\$13.50	\$0.26419	\$32.72	\$0.42501	\$52.64	\$98.87
2/1/2013	292,560	36,483,547	124.70	\$13.50	\$0.26419	\$32.95	\$0.43069	\$53.71	\$100.15
3/1/2013	291,936	33,630,307	115.20	\$13.50	\$0.26419	\$30.43	\$0.43069	\$49.61	\$93.55
4/1/2013	293,366	23,246,597	79.24	\$13.50	\$0.26419	\$20.93	\$0.43069	\$34.13	\$68.56
5/1/2013	292,363	9,119,621	31.19	\$13.50	\$0.26419	\$8.24	\$0.43069	\$13.43	\$35.18
6/1/2013	291,618	4,992,441	17.12	\$13.50	\$0.26419	\$4.52	\$0.43069	\$7.37	\$25.40
7/1/2013	291,437	3,775,673	12.96	\$13.50	\$0.26419	\$3.42	\$0.43069	\$5.58	\$22.50
8/1/2013	291,149	3,710,252	12.74	\$13.50	\$0.26419	\$3.37	\$0.55168	\$7.03	\$23.90
9/1/2013	290,893	3,681,157	12.65	\$13.50	\$0.26419	\$3.34	\$0.55168	\$6.98	\$23.82
10/1/2013	290,878	4,546,403	15.63	\$13.50	\$0.26419	\$4.13	\$0.55168	\$8.62	\$26.25
11/1/2013	291,013	14,929,607	51.30	\$13.50	\$0.26419	\$13.55	\$0.51737	\$26.54	\$53.60
12/1/2013	293,038	32,679,360	111.52	\$13.50	\$0.26419	\$29.46	\$0.51737	\$57.70	\$100.66
1/1/2014	294,027	46,290,279	157.44	\$13.50	\$0.26419	\$41.59	\$0.51737	\$81.45	\$136.55
2/1/2014	293,954	47,747,014	162.43	\$13.50	\$0.26419	\$42.91	\$0.51891	\$84.29	\$140.70
3/1/2014	293,728	36,313,089	123.63	\$13.50	\$0.26419	\$32.66	\$0.51891	\$64.15	\$110.31
4/1/2014	293,632	18,578,070	63.27	\$13.50	\$0.26419	\$16.72	\$0.51891	\$32.83	\$63.05
5/1/2014	293,022	7,675,847	26.20	\$13.50	\$0.26419	\$6.92	\$0.59588	\$15.61	\$36.03
6/1/2014	292,079	4,725,629	16.18	\$13.50	\$0.26419	\$4.27	\$0.59588	\$9.64	\$27.42
7/1/2014	292,289	3,810,384	13.04	\$13.50	\$0.26419	\$3.44	\$0.59588	\$7.77	\$24.71
8/1/2014	291,260	3,504,217	12.03	\$13.50	\$0.26419	\$3.18	\$0.62313	\$7.50	\$24.18
9/1/2014	291,490	3,646,971	12.51	\$13.50	\$0.26419	\$3.31	\$0.62313	\$7.80	\$24.60
10/1/2014	291,567	5,425,008	18.61	\$13.50	\$0.26419	\$4.92	\$0.62313	\$11.59	\$30.01
11/1/2014	290,459	16,770,441	57.74	\$13.50	\$0.26419	\$15.25	\$0.56128	\$32.41	\$61.16
12/1/2014	295,230	32,572,940	110.33	\$13.50	\$0.26419	\$29.15	\$0.56128	\$61.93	\$104.57

Note 1: All calculations reflect the charges in effect during the month.
Note 2: 2012 reflects the Basic Service Charge and Distribution Charge from Case No. 2009-00549.
Note 3: 2013 and 2014 reflects the Basic Service Charge and Distribution Charge from Case No. 2012-00222.

Attachment B
First Request for Information of Association of Community Ministries to Louisville Gas and Electric Company, Question No. 6
Case No. 2016-00371

Attachment to Response to LGE ACM-1 Question No. 6
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Conroy

Month	Electric Customers	Electricity Consumption				Average Residential Electric Consumption	Basic Service Charge	Energy Charge	Energy Revenue
		RSWH	Net Metering	RS	Total				
Aug 2012	350,074	732,875	155,089	518,262,837	519,150,801	1,483	\$ 8.50	0.07242	\$ 115.90
Sep 2012	348,703	755,537	119,438	435,201,072	436,076,047	1,251	\$ 8.50	0.07242	\$ 99.10
Oct 2012	349,861	695,774	74,236	256,419,625	257,189,635	735	\$ 8.50	0.07242	\$ 61.73
Nov 2012	348,707	817,011	89,684	258,850,685	259,757,380	745	\$ 8.50	0.07242	\$ 62.45
Dec 2012	348,850	921,561	100,614	291,926,571	292,948,746	840	\$ 8.50	0.07242	\$ 69.33
Jan 2013	350,205	1,063,967	149,050	366,557,724	367,770,741	1,050	\$ 10.75	0.07439	\$ 88.86
Feb 2013	349,855	1,009,584	129,870	334,053,460	335,192,914	958	\$ 10.75	0.07439	\$ 82.02
Mar 2013	350,018	988,808	117,906	312,254,579	313,361,293	895	\$ 10.75	0.07439	\$ 77.33
Apr 2013	350,767	945,348	91,110	275,170,525	276,206,983	787	\$ 10.75	0.07439	\$ 69.29
May 2013	350,049	849,350	78,611	248,079,135	249,007,096	711	\$ 10.75	0.07439	\$ 63.64
Jun 2013	350,139	824,941	110,252	355,457,003	356,392,196	1,018	\$ 10.75	0.07439	\$ 86.48
Jul 2013	350,908	675,339	137,407	438,186,275	438,999,021	1,251	\$ 10.75	0.07949	\$ 110.19
Aug 2013	350,931	649,266	139,727	443,146,015	443,935,008	1,265	\$ 10.75	0.07949	\$ 111.30
Sep 2013	350,748	634,195	185,331	453,575,916	454,395,442	1,296	\$ 10.75	0.07949	\$ 113.77
Oct 2013	350,845	618,791	94,492	304,081,623	304,794,906	869	\$ 10.75	0.07949	\$ 79.83
Nov 2013	349,988	714,607	92,222	257,471,207	258,278,036	738	\$ 10.75	0.07949	\$ 69.41
Dec 2013	351,397	904,583	150,551	344,331,823	345,386,957	983	\$ 10.75	0.07949	\$ 88.89
Jan 2014	352,132	1,038,347	192,784	418,745,684	419,976,815	1,193	\$ 10.75	0.08076	\$ 107.10
Feb 2014	352,319	952,219	184,094	383,728,411	384,864,724	1,092	\$ 10.75	0.08076	\$ 98.94
Mar 2014	353,626	927,781	133,746	325,379,194	326,440,721	923	\$ 10.75	0.08076	\$ 85.29
Apr 2014	353,297	831,206	88,307	249,761,470	250,680,983	710	\$ 10.75	0.08076	\$ 68.09
May 2014	353,039	768,882	79,310	262,861,434	263,709,626	747	\$ 10.75	0.08076	\$ 71.08
Jun 2014	353,825	700,359	120,280	376,007,676	376,828,315	1,065	\$ 10.75	0.08076	\$ 96.76
Jul 2014	353,957	666,963	158,528	465,034,657	465,860,148	1,316	\$ 10.75	0.08076	\$ 117.03
Aug 2014	353,655	594,367	137,981	398,054,017	398,786,365	1,128	\$ 10.75	0.08076	\$ 101.85
Sep 2014	353,828	615,037	152,214	421,787,312	422,554,563	1,194	\$ 10.75	0.08076	\$ 107.18
Oct 2014	353,776	623,659	98,437	275,541,564	276,263,660	781	\$ 10.75	0.08076	\$ 73.82
Nov 2014	351,716	684,968	97,982	251,424,435	252,207,385	717	\$ 10.75	0.08076	\$ 68.65
Dec 2014	354,796	846,489	170,570	334,460,214	335,477,273	946	\$ 10.75	0.08076	\$ 87.15

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First Request for Information of Association of Community Ministries to Louisville Gas and Electric Company, Question No. 7
Case No. 2016-00371

LOUISVILLE GAS AND ELECTRIC COMPANY
CASE NO. 2014-00372
Typical Electric Bill Comparison under Present & Proposed Rates
FORECAST PERIOD FOR THE 12 MONTHS ENDED JUNE 30, 2016

DATA: BASE PERIOD FORECASTED PERIOD
TYPE OF FILING: ORIGINAL UPDATED REVISED
WORKPAPER REFERENCE NO(S): _____

SCHEDULE N (Electric)
PAGE 1 OF 1
WITNESS: R. M. CONROY

Residential (Rate RS) / Volunteer Fire Dept (Rate VFD)

Average Monthly kWh	A		B		C		D		E			F		G		H		I		J		
	Base Rate		Base Rate		Increase		Increase		Billing Factors (per kWh charge)			Current		Proposed		Total		Total		Increase		
	Current	Proposed	Current	Proposed	(\$)	(%)	(\$)	(%)	FAC	DSM	ECR	Bill	(\$)	Bill	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(%)	(%)
				[B - A]	[C / A]	\$ (0.00019)	\$ 0.00186	\$ 0.00884				[A+E+F+G]	[B+E+F+G]	[(I - H)/H]								
Jul 2015	1,435	\$ 126.64	\$ 127.32	\$ 0.68	0.5%	\$ (0.28)	\$ 2.67	\$ 12.68	\$ 141.71	\$ 142.39	0.5%											
Aug 2015	1,433	\$ 126.48	\$ 127.17	\$ 0.69	0.5%	\$ (0.28)	\$ 2.67	\$ 12.66	\$ 141.53	\$ 142.22	0.5%											
Sep 2015	1,074	\$ 97.49	\$ 99.82	\$ 2.33	2.4%	\$ (0.21)	\$ 2.00	\$ 9.49	\$ 108.77	\$ 111.10	2.1%											
Oct 2015	762	\$ 72.29	\$ 76.05	\$ 3.76	5.2%	\$ (0.15)	\$ 1.42	\$ 6.73	\$ 80.29	\$ 84.05	4.7%											
Nov 2015	713	\$ 68.33	\$ 72.32	\$ 3.98	5.8%	\$ (0.14)	\$ 1.33	\$ 6.30	\$ 75.82	\$ 79.81	5.3%											
Dec 2015	928	\$ 85.70	\$ 88.70	\$ 3.00	3.5%	\$ (0.18)	\$ 1.73	\$ 8.20	\$ 95.45	\$ 98.45	3.1%											
Jan 2016	1,037	\$ 94.50	\$ 97.00	\$ 2.50	2.7%	\$ (0.20)	\$ 1.93	\$ 9.16	\$ 105.39	\$ 107.89	2.4%											
Feb 2016	907	\$ 84.00	\$ 87.10	\$ 3.10	3.7%	\$ (0.18)	\$ 1.69	\$ 8.01	\$ 93.52	\$ 96.62	3.3%											
Mar 2016	854	\$ 79.72	\$ 83.06	\$ 3.34	4.2%	\$ (0.17)	\$ 1.59	\$ 7.55	\$ 88.69	\$ 92.03	3.8%											
Apr 2016	713	\$ 68.33	\$ 72.32	\$ 3.98	5.8%	\$ (0.14)	\$ 1.33	\$ 6.30	\$ 75.82	\$ 79.81	5.3%											
May 2016	815	\$ 76.57	\$ 80.09	\$ 3.52	4.6%	\$ (0.16)	\$ 1.52	\$ 7.20	\$ 85.13	\$ 88.65	4.1%											
Jun 2016	1,134	\$ 102.33	\$ 104.39	\$ 2.06	2.0%	\$ (0.22)	\$ 2.11	\$ 10.02	\$ 114.24	\$ 116.30	1.8%											
	984	\$ 90.22	\$ 92.96	\$ 2.74	3.0%	\$ (0.19)	\$ 1.83	\$ 8.69	\$ 100.55	\$ 103.29	2.7%											

Assumptions:
Average usage = 984 kWh per month
Billing Factors calculated as a unit charge based on forecast period revenues and volumes
Calculations may vary from other schedules due to rounding
Average Monthly kWh is based on forecasted volume and number of customers for each month

Attachment 1 to Response to LGE ACM-2 Question No. 4
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**First Request for Information of Association of Community Ministries to Louisville Gas
and Electric Company, Question No. 7**
Case No. 2016-00371

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<u>Source: Schedule M-2.2; M-2.3</u>								
	<u>Revenue As Billed</u>	<u>FAC Billings</u>	<u>DSM Billings</u>	<u>ECR Billings</u>	<u>Energy</u>	<u>FAC / kWh</u>	<u>DSM / kWh</u>	<u>ECR / kWh</u>
					<u>kWh</u>	<u>[(2) / (5)]</u>	<u>[(3) / (5)]</u>	<u>[(4) / (5)]</u>
Residential/VFD	\$ 436,027,011	\$ (827,983)	\$ 7,942,641	\$ 37,698,883	4,266,714,109	\$ (0.00019)	\$ 0.00186	\$ 0.00884

Attachment C
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**First Request for Information of Association of Community Ministries to Louisville Gas
and Electric Company, Question No. 7**
Case No. 2016-00371

LOUISVILLE GAS AND ELECTRIC COMPANY
CASE NO. 2014-00372
Typical Gas Bill Comparison under Present & Proposed Rates
FORECAST PERIOD FOR THE 12 MONTHS ENDED JUNE 30, 2016

DATA: BASE PERIOD FORECASTED PERIOD
TYPE OF FILING: ORIGINAL UPDATED REVISED
WORKPAPER REFERENCE NO(S): _____

SCHEDULE N (Gas)
PAGE 1 OF 1
WITNESS: R. M. CONROY

Residential (Rate RGS) / Volunteer Fire Dept (Rate VFD)

	Average Monthly MCF	A		B		C	D	E			H	I	J			
		Base Rate Current Bill	Base Rate Proposed Bill	Increase (\$) [B - A]	Increase (%) [C / A]			Billing Factors (per MCF/meter charge)						Total Current Bill (\$) [A+E+F+G]	Total Proposed Bill (\$) [B+E+F+G]	Increase (%) [(I - H) / H]
								GSC \$5.26/MCF	DSM \$0.10/MCF	GLT \$3.63/meter						
Jul-15	1.3	\$ 16.91	\$ 21.76	\$ 4.85	28.7%	\$ 6.80	\$ 0.12	\$ 3.63	\$ 27.46	\$ 32.31	17.7%					
Aug-15	1.4	\$ 17.14	\$ 21.93	\$ 4.79	28.0%	\$ 7.24	\$ 0.13	\$ 3.63	\$ 28.14	\$ 32.93	17.0%					
Sep-15	1.6	\$ 17.72	\$ 22.41	\$ 4.69	26.5%	\$ 8.41	\$ 0.15	\$ 3.63	\$ 29.91	\$ 34.60	15.7%					
Oct-15	2.9	\$ 21.14	\$ 25.16	\$ 4.02	19.0%	\$ 15.20	\$ 0.28	\$ 3.63	\$ 40.25	\$ 44.27	10.0%					
Nov-15	6.3	\$ 30.02	\$ 32.33	\$ 2.31	7.7%	\$ 32.89	\$ 0.60	\$ 3.63	\$ 67.14	\$ 69.45	3.4%					
Dec-15	11.6	\$ 44.23	\$ 43.81	\$ (0.42)	-1.0%	\$ 61.19	\$ 1.12	\$ 3.63	\$ 110.17	\$ 109.75	-0.4%					
Jan-16	13.9	\$ 50.23	\$ 48.64	\$ (1.59)	-3.2%	\$ 73.12	\$ 1.33	\$ 3.63	\$ 128.31	\$ 126.72	-1.2%					
Feb-16	12.1	\$ 45.49	\$ 44.82	\$ (0.67)	-1.5%	\$ 63.70	\$ 1.16	\$ 3.63	\$ 113.98	\$ 113.31	-0.6%					
Mar-16	8.5	\$ 36.08	\$ 37.22	\$ 1.14	3.2%	\$ 44.95	\$ 0.82	\$ 3.63	\$ 85.48	\$ 86.62	1.3%					
Apr-16	4.4	\$ 25.10	\$ 28.36	\$ 3.26	13.0%	\$ 23.09	\$ 0.42	\$ 3.63	\$ 52.24	\$ 55.50	6.2%					
May-16	2.4	\$ 19.92	\$ 24.18	\$ 4.26	21.4%	\$ 12.78	\$ 0.23	\$ 3.63	\$ 36.56	\$ 40.82	11.7%					
Jun-16	1.4	\$ 17.22	\$ 22.00	\$ 4.78	27.8%	\$ 7.41	\$ 0.14	\$ 3.63	\$ 28.40	\$ 33.18	16.8%					
Annual Avg	5.7	\$ 28.56	\$ 31.16	\$ 2.60	9.1%	\$ 29.98	\$ 0.55	\$ 3.63	\$ 62.72	\$ 65.32	4.2%					

Assumptions:
Average usage = 5.7 Mcf per month
Billing Factors calculated as a unit charge based on forecast period revenues and volumes
Calculations may vary from other schedules due to rounding
Average Monthly MCF is based on forecasted volume and number of customers for each month

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**First Request for Information of Association of Community Ministries to Louisville Gas
and Electric Company, Question No. 7**
Case No. 2016-00371

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Source: Schedule M-2.2 and M-2.3	Revenue As Billed	GSC	DSM	GLT	Volume MCF	GSC / MCF [(2) / (5)]	DSM / MCF [(3) / (5)]	# OF CUSTOMERS	GLT/ Customer [(4) / (8)]
Residential Gas Service - Rate RGS	\$ 220,393,502	\$ 105,116,312	\$ 1,917,198	\$ 12,833,669	19,985,070.6	\$ 5.26	\$ 0.10	3,535,390	\$ 3.63

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s January 11, 2017 electronic filing of the foregoing First Requests For Information of Association of Community Ministries, Inc. 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 copies in paper medium are being mailed to the Commission via Express Mail on January 11, 2017.

Lisa Kilkelly

Lisa Kilkelly