

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

**In The Matter Of:**

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

**SECOND 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 refer to the Attachment to the Response to Question No. 2(a) (b) of the First Request for Information of Association of Community Ministries (“ACM’s First Request”).
  - a) Describe what information was used to calculate the figures in the “Average Number of Residential Customers” column and provide the calculations in Excel format.
  - b) Provide the actual numbers of Residential Customers responsible for generating each of the figures listed under the Total Residential Sales columns.
  - c) Please describe what the figures in the “Total kWh Residential Sales” and “Total Ccf Residential Sales” columns represent, such as total amounts of energy consumed or total amounts billed upon.
  
2. Please refer to the Attachment to Response to ACM’s First Request Question 3(a) (b).
  - a) Describe what information was used to calculate the figures in the “Average Number of Residential Customer Accounts Receiving 3<sup>rd</sup> Party Assistance” column and provide the calculations in Excel format.
  - b) Provide the actual numbers of Residential Customer Accounts Receiving 3<sup>rd</sup> Party Assistance responsible for generating each of the figures listed under the Residential Sales columns.
  - c) Please describe what the figures in the “kWh Residential Sales” and “Ccf Residential Sales” columns represent, such as amounts of energy consumed or billed upon, and whether such figures are “total” sales, similar to what

was provided in the Attachment to Response to ACM's First Request Question 2(a)(b).

3. Please refer to the Attachment to Response to ACM's First Request Question 4(a).
  - a) Describe what information was used to calculate the figures in the "Number of Residential Electric Customer Accounts Billed" and provide the calculations in Excel format.
  - b) If not already provided, provide the number of Residential Electric Customer Accounts responsible for generating each of the figures listed under the Residential Electric Billed Revenue (kWh) column in Excel format.
  - c) Please describe what the figures in the "Residential Electric Billed Revenue (kWh)" column represent, such as amounts of energy consumed or billed upon.
  - d) Please describe the amounts listed under the Average Use kWh per Residential Electric Customer Accounts. If these are not the average annual usage amounts, please provide the average annual usage amounts as requested in ACM's First Request Question 4(a) and the supporting calculations in Excel format.
4. Please refer to the Attachment to Response to ACM's First Request Question 4(b).
  - a) Describe what information was used to calculate the figures in the "Number of Residential Gas Customer Accounts Billed" and provide the calculations in Excel format.

- b) If not already provided, provide the number of Residential Gas Customer Accounts responsible for generating each of the figures listed under the Residential Gas Billed Ccf column in Excel format.
- c) Please describe what the figures in the “Residential Gas Billed Ccf” column represent such as amounts of energy consumed or billed upon.
- d) Please describe the amounts listed under the Residential Gas Average Annual Use Ccf per Customer Accounts. If these are not the average annual usage amounts, please provide the average annual usage amounts as requested in ACM’s First Request Question 4(b) and the supporting calculations in Excel format.

5. Please refer to the Supplemental Attachment to Response to ACM’s First Request Question 9 (a) and provide the same information as provided on the Non-Payment Disconnection/Reconnection Reports for the months of July 2016 through December 2016 for both gas and electric customers.

6. Please refer to the Supplemental Attachment to Response to ACM’s First Request Question 9 (a) and the Attachment to Response to ACM’s First Request Question 10(a) and (b). The sum of the disconnections of electric customers during the 2015 -2016 year reported in question 9(a) is 64,212. For the same year, the sum of disconnections reported in Question 10 is 60,784 (14,562 electric only + 46,258 combined), a difference of 3,428. Please explain the reason for this difference. If any information originally provided is incorrect, please provide the correct information.

7. Please refer to the Attachment to Response to ACM's First Request Question 10 (a) (b) and (c) and provide the same information for the period July 1, 2016 through December 31, 2016.

8. Please refer to the Response to ACM's First Request Question 11. For each month provided in the Response (January 2015 through December 2016) please provide in Excel format a breakdown of the amount of third party assistance by type of assistance as listed on the LGE/KU Web portal through which third party assistance providers make pledges.

9. For each of the types of assistance listed on the LGE/KU Web portal please provide the following information for each month of calendar years 2015 and 2016 for Jefferson County broken down by zip code.

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

10. Please state the number of disconnection notices that LG&E sent during 7/1/2014 through 6/30/2015 to customers who received third party assistance during the time period 7/1/2014 through 6/30/2015.

11. Please state the number of disconnection notices that LG&E sent during 7/1/2015 through 6/30/2016 to customers who received third party assistance during 7/1/2015 through 6/30/2016.

12. Please state the number of disconnection notices that LG&E sent during 7/1/2016 through 12/31/2016 to customers who received third party assistance during 7/1/2016 through 12/31/2016.

13. Please provide the cost of preparing and sending out a disconnection notice for non-payment to an LG&E residential customer and provide a breakdown of the components of such cost, such as staff time, postage and materials.

14. Please state whether the cost of preparing and sending out a disconnection notice is included in the \$14.22 figure referred to in the Response to ACM's First Request Question 37 (a) and (b) as the current cost of disconnecting a customer.

15. Please refer to the Attachment to Response to ACM's First Request Question 13(a) (b) and (c).

- a) Please state the time period in which the customers listed received third party assistance.
- b) Provide the same information requested in ACM's First Request Question 13 for the period July 1, 2016 through December 31, 2016.
- c) If not already provided, please provide the information requested in ACM's First Request Question 13, and in part b above, for customers who received third party assistance during the same period as the disconnection occurred. For example, customers listed under the 7/01/2014 – 6/30/2015 heading would have received third party assistance during the 7/01/2014 – 6/30/2015 period; customers listed under the 7/01/2015 – 6/30/2016 heading would have received third party assistance during the 7/01/2015 – 6/30/2016 period and customers to be listed for the 7/01/2016 – 12/31/2016 period would have received third party assistance during the 7/01/2016 – 12/31/2016 period.

16. Please refer to the Attachment to Response to ACM's First Request Question 14 and provide the same information for the period 7/1/2016 through 12/31/2016.

17. Please refer to the Response to ACM's First Request Question 15. Is the reason that there will be no change in the number of meters subject to the HEA charge that customers who have more than one electric meter currently are only billed one HEA charge, and similarly that customers who have more than one gas meter currently are only billed one HEA charge? If not, please explain.

18. Please provide in Excel format the number of residential accounts in the LG&E territory by zip code for the periods 7/1/2014 through 6/30/2015, 7/1/2015 through 6/30/2016 and 7/1/2016 through 12/31/2016 which were electric only, gas only and combined gas and electric.

19. Please provide in Excel format the monthly number of LG&E residential accounts disconnected for nonpayment for each month starting in July 2014 through December 2016 for the following zip codes: 40118 40202; 40203, 40208, 40209, 40210, 40211, 40212, 40213, 40214, 40215, 40216, 40217, 40218, 40219. Please provide this information for

- a) residential electric only,
- b) residential combined electric and gas and
- c) residential gas only.

20. Please provide in Excel format a list of all zip codes in which LG&E provides residential electric service and the current number of residential electric customers in each, broken down by number of electric only and number of electric combined customers.

21. Please provide in Excel format a list of all zip codes in which LG&E provides residential gas service and the current number of residential gas customers in each, broken down by number of gas only and number of gas combined customers.

22. Please state the number of residential gas customers disconnected for nonpayment, who had not been reconnected and who had an unpaid balance as of:

- a) June 30, 2014
- b) June 30, 2015
- c) June 30, 2016

23. Please state the number of residential electric customers disconnected for nonpayment, who had not been reconnected and who had an unpaid balance as of:

- a) June 30, 2014
- b) June 30, 2015
- c) June 30, 2016

24. Please provide the Tetra Tech analysis referenced in the Response to ACM's First Request Question 20(c).

25. Please refer to the Response to ACM's First Request Questions 20(d) and (e). Does LG&E have the ability to provide the requested information? If "yes," please explain why it declines to do so. If not, please explain why not.

26. Please refer to the Responses to ACM's First Request Question 25(b), which asks how many of the e-mails delivered were delivered to customers who had a bill payment made by a third party assistance provider. The Response states that it is "unable to match individual completed surveys to customer account numbers." Is LG&E able to match the e-mails were sent (and that were delivered) to customer account numbers? If so, please provide the requested information.

27. Please refer to the Response to ACM's First Request Question 25(d), which asks how many of the surveys completed by LG&E customers were completed by a customer who



had a bill payment made by a third party assistance provider during a certain time period. The Response states that it is unable to match individual completed surveys to customer account numbers. Please explain why LG&E was able to provide a breakdown of individual survey responses by zip code in response to ACM's First Request Question 25(c), but cannot provide the information requested in 25(d).

28. Please refer to the Responses to ACM's First Request Questions 26 through 29, respectively, which provide the requested information broken down by zip code but, in response to requests for the same information concerning recipients of third party assistance in each instance states that "the Company is unable to match individual completed surveys to customer account numbers." Please explain why LG&E can match individual completed surveys to individual customer zip code, but cannot match individual completed surveys to individual accounts so as to identify third party assistance recipients.

29. Please refer to the Response to ACM's First Request Question 30(e).

- a) Please confirm that the column heading to the far right should read "Of d), My Account Payments made on...."
- b) Do the figures in the column on the far right include payments made through the web portal reserved for third party assistance providers? If so, please break each figure down into payments made through the provider portal and payments made through an individual customer's on line account.

30. Please explain why LG&E does not have available to it the number of its residential customers who used the referenced on-line service to start, move or stop service, as

requested in ACM's First Request Question 31(a) and (c), but is able to provide the number of LG&E third party assistance recipient customers who so used that service.

31. Referring to the Response to ACM's First Request Question 32, please explain why LG&E is able to provide the number of LG&E third party assistance recipient customers who signed up for My Notifications, but cannot provide the total number of residential customers in the LG&E service territory who did so, including a zip code breakdown, as requested in Q 32(a).

32. What is the current cost of disconnecting the gas portion of a residential LG&E combined customer's service for nonpayment?

33. Referring to the Response to ACM's First Request Question 37(a) and (b), please confirm that the cost of disconnecting a residential electric-only LG&E customer for nonpayment and the cost of disconnecting a residential combined (gas and electric) customer for nonpayment are the same. If not confirmed, please explain why not.

34. Please provide a breakdown of the components of the current costs, respectively, of disconnecting and then reconnecting each of the following: a residential electric-only customer; a residential combined (gas and electric) customer; and a residential gas-only customer.

35. What is the current cost of reconnecting the gas portion of a residential LG&E combined customer disconnected for nonpayment?

36. Referring to the Response to ACM's First Request Question 38(a) and (b), please confirm that the cost of reconnecting a residential electric-only LG&E customer after disconnection for nonpayment and cost of reconnecting a residential combined (gas and electric)

customer following disconnection for nonpayment are the same. If not confirmed, please explain why not.

37. Please refer to the Response to ACM's First Request Question 39, which incorporates the Company's response to AG 1-357.

- a) How will LG&E operationalize its "clear incentive to maintain service to customers...." as asserted in response to AG 1-357(c)?
- b) Will the automated system be set to automatically remotely disconnect residential electric service on the final due date, or will human action be required to initiate the remote disconnection?
- c) Will LG&E have policies, procedures and mechanisms in place to delay the automatic remote disconnection if a customer is in the process of working out a payment plan? Please describe them in detail.
- d) Will LG&E have policies, procedures and mechanisms in place to delay the automatic remote disconnection for customers who are pursuing third party assistance, but are only able to secure an appointment date that falls after the scheduled disconnection date? Please describe them in detail.
- e) Will LG&E have policies, procedures and mechanisms in place to delay the automatic disconnection for customers who are in the process of securing a medical certificate pursuant to 807 KAR 5:006 Section 15(2)(c), but may need extra time to receive a response from their medical provider? Please describe them in detail.
- f) At what time of day will automatic remote disconnections be executed?

38. Will customers who are to be disconnected remotely have advance notice of the time of day disconnection will occur? Please explain.

39. Please refer to ACM's First Request Question 18(b), which references the statement in the Advanced Metering Business Case that the "Company is leveraging lessons learned and best practices from PPLEU for successful deployment in Kentucky," and asks for the policies, procedures and safeguards PPLEU has developed regarding remote disconnection for nonpayment by residential customers, and the Company's response, which simply states that "PPLEU operates under a different regulatory environment and therefore their operational procedures may not be applicable to LG&E," without providing any further information.

- a) Does LG&E believe that lessons learned and best practices from PPLEU are only instructive for purposes of the planned KY deployment to the extent that the companies' respective regulatory environments are the same?
- b) Please provide the requested information, subject to the understanding that the regulatory environments in KY and PA are different.

40. Please refer to ACM's First Request Question 18(c), which asks whether the Companies have 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, and LG&E's response, which does not answer this question. Please respond to the question asked, including the request for documents included therein.

41. Referring to the Response to ACM's First Request Question 40(a), please confirm that LG&E does not know what proportion of the O&M savings cited on page 17 of the Malloy

testimony will accrue to it and its customers, as opposed to KU and KU's customers. If this is not confirmed, please explain and please provide the requested breakdown.

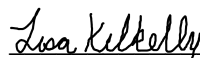
42. Referring to the Response to ACM's First Request Question 40(b), please confirm that LG&E has not calculated, and does not otherwise have available to it, the projected O&M savings to be achieved by remotely disconnecting residential customers for nonpayment, as distinct from other projected disconnections. If this is not confirmed, please explain and please provide the requested information.

43. Please describe LG&E's current policies, practices and procedures regarding disconnection of residential accounts during cold weather.

44. Please provide the following information regarding the WeCare program:

- a) the number of LG&E customers who received WeCare assistance in each of the calendar years 2014, 2015 and 2016;
- b) of the customers in (a), the number in each year, respectively, who had a payment made on their behalf by a third party assistance provider at any time between January 1, 2014 and December 31, 2016; and
- c) the total and average energy savings achieved by the WeCare participants identified in (a), above, during each of calendar years 2014, 2015 and 2016.

Respectfully submitted,



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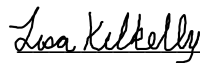
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Counsel for ACM

Dated: February 7, 2017

**CERTIFICATE OF COMPLIANCE**

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s February 7, 2017 electronic filing of the foregoing Second 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 February 7, 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 February 7, 2017.

  
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Lisa Kilkelly