

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)
LOUISVILLE GAS AND ELECTRIC COMPANY)
AND KENTUCKY UTILITIES COMPANY) CASE NO. 2018-00005
FOR CERTIFICATES OF PUBLIC CONVENIENCE)
AND NECESSITY FOR FULL DEPLOYMENT)
OF ADVANCED METERING SYSTEMS)

**COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE,
BOURBON, HARRISON, AND NICHOLAS COUNTIES, INC.'S
INITIAL REQUESTS FOR INFORMATION**

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Comes the Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc. (hereinafter "CAC"), by counsel, and for its Initial Requests for Information states as follows:

GENERAL INSTRUCTIONS

- (1) Please identify the company witness or witnesses who will be prepared to answer questions concerning each request.
- (2) You may request clarification directly from the undersigned if any question appears confusing.
- (3) If specific document or information as requested does not exist, but a similar document or information does exist, provide the similar document or information.
- (4) For any document withheld on the basis of privilege, state the following: date, author, addressee, all persons to whom distributed and the nature of and legal basis of the privilege.
- (5) If 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.
- (6) "Companies" means Louisville Gas and Electric Company and Kentucky Utilities Company.

REQUESTS FOR INFORMATION

1. Please refer to page 2, line 21 through page 3, lines 1-5 of Mr. Malloy's testimony. In his explanation of the net savings that will result from full deployment of AMS, he includes the net savings that will result from "reduced energy consumption by customers as they become more aware of their consumption patterns by reviewing the granular consumption information AMS provides and seeking to increase their energy-efficiency measures and behaviors." How can the companies' customers with low income without internet access reduce their energy consumption through AMS?

2. How will the companies make consumption information provided by AMS available to customers with low income who do not have internet access?

3. Page 26, footnote 35 of Mr. Malloy's testimony states that 70.9% of Kentucky households have broad-band internet subscriptions. What percentage of Kentuckians living at or below the poverty level have broadband internet access or other internet access, such as dial-up?

4. What percentage of Kentucky Utilities Company customers have internet access?

5. What percentage of Kentucky Utilities Company customers with low income have internet access?

6. What consideration have the companies given to the barriers that customers with low income face that limit their ability to benefit from the savings opportunities of AMS?

7. How do the companies propose to deal with the barriers that customers with low income face that limit their ability to benefit from energy consumption savings through AMS?

8. Please refer to page 12, lines 13-16 of Mr. Malloy's testimony. In describing the participating customers in the 2014 DSM-EE AMS Customer Service Offering, he states that they are "geographically diverse, spanning various topographies, population densities, and socio-economic segments throughout the Companies' Kentucky service territories."

a. What percentage of the participating customers in the Customer Service Offering are customers with low income, in that they live at or below the poverty level?

b. Please provide the detailed breakdown of the socio-economic segments of customers who have elected to participate in the AMS Customer Service Offering, to date.

c. Please provide the percentage of the customers who have elected to participate in the AMS Customer Offering who also participate in income-based assistance programs such as heating assistance or WeCare.

9. Mr. Malloy's testimony on page 13, lines 6-10, refers to the 2016 Bellomy Research Study of the AMS Customer Service Offering participants who had accessed MyMeter Dashboard. The testimony states that half of those persons had programmed their programmable thermostats. How many of these participants who programmed their programmable thermostats are customers with low income?

10. a. The companies have pledged that they do not intend to make changes to their service disconnection or reconnection policies. Are the companies willing to add any additional safeguards to the disconnect process in light of the fact that remote disconnects can be made instantaneously?

b. If yes, what additional safeguards are the companies willing to add?

11. Please provide any data relied upon or in the possession of the companies from other markets that have implemented advanced metering, that demonstrate savings to customers with low income as a result of their having access to more granular energy consumption data.

12. a. Please provide a specific list of ways the companies anticipate customers will adjust energy consumption habits and behaviors in order to reduce their energy bills after deployment of AMS.

b. Please provide estimates (or ranges) of potential energy savings that you anticipate from each of the specific adjustments described above.

13. Please provide any data relied upon or in the possession of the companies from other markets that have implemented advanced metering, that shows how AMS adoption affects the number and/or frequency of service disconnections per household?

14. Please provide any data, relied upon or in the possession of the companies from other markets that have implemented advanced metering, that shows how AMS adoption affects the number and/or frequency of service disconnections for customers who participate in income based energy assistance programs.

15. Do the companies intend to offer assistance to customers with low income to offset the cost of opt-out fees and monthly charges, so that these customers will not face a barrier to freely choosing their meter type?

16. Please detail any plans the companies have to provide information and education about AMS and energy efficiency specifically to landlords of multifamily homes.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that CAC's April 2, 2018 electronic filing is a true and accurate copy of CAC's Initial Requests for Information and Read 1st document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on April 2, 2018; that an original and six copies of the filing will be delivered to the Commission on April 2, 2018; that there are currently no parties excused from participation by electronic service; and that, on April 2, 2018, electronic mail notification of the electronic filing is provided to the following:

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