

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**  
**RESPONSE TO COMMISSION STAFF'S INITIAL**  
**REQUEST 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 submits its Response to Commission Staff's Initial Request for Information

Respectfully submitted,



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COUNSEL FOR CAC

1. Refer to the Direct Testimony of Malcolm J. Ratchford (“Ratchford Testimony”), page 10, which states that access to a web-based portal could assist customers with managing their energy use and that many low-income households do not have access to technology and therefore do not have access to the web-based portal. Explain whether CAC is aware of other methods of communicating a household’s energy use that could assist low-income households in adjusting their energy consumption in order to realize significant savings.

**Witness: Malcolm J. Ratchford**

**Answer:** CAC suggests the following methods that could be used to communicate a household’s energy use in order to realize a significant savings:

A summary sheet with each monthly bill that lists information accessible through the AMS portal. This summary sheet could include a household’s specific dates of highest use and times (15-minute intervals) of household’s highest daily use, which will help the household determine which specific appliances/activities are the most energy-intensive. The summary sheet could also include a comparison of average usage on weekends vs. weekdays. For weekdays, the summary sheet could include a comparison of average usage during the day (“standard” work hours) versus evening hours versus nighttime hours.

Another recommendation is to allow customers to sign up for notifications (e.g., text) of days when energy use is much higher than average, or higher than a pre-determined limit that the customer sets to achieve a certain energy usage. Additional recommendations include offering customers access to a brief phone consultation with someone from Kentucky Utilities and Louisville Gas and Electric that will help them read their bill, or providing specific, real examples (from other AMS users) of ways that they reduced their consumption using the AMS data, and the actual savings they realized. It would also be helpful if households had access to a video tutorial on how to read the AMS data, and how to interpret and apply it.

2. Refer to the Ratchford Testimony, page 12, regarding CAC's concerns about notice of disconnection and the need for "multiple channels" of communication.

a. State with specificity the multiple channels CAC proposes that Kentucky Utilities and Louisville Gas and Electric Company implement regarding disconnection warning notices.

b. Explain whether the multiple channels identified by CAC could be utilized to communicate a household's energy use in place of a web-based portal.

**Witness: Malcolm J. Ratchford**

**Answer:** a. CAC proposes that Kentucky Utilities and Louisville Gas and Electric encourage customers to provide both home phone and cell phone numbers upon initiating services and these forms of contacts be used along with postal mail, short message service (SMS), and email.

b. Yes, the above channels might be used to communicate general data about a household's energy, described in Question 1.

3. Refer to Ratchford Testimony, page 12, regarding concerns about the possibility of a large volume of service disconnections. Explain whether CAC believes that a larger number of customers with overdue bills will be disconnected earlier in the collection cycle or whether ACM [sic] believes that a larger number of customers will be disconnected if AMS meters are installed.

**Witness: Malcolm J. Ratchford**

**Answer:** CAC believes that, as a result of the faster and remote disconnection capabilities of AMS technology, it is possible both that a larger number of customers with overdue bills will be disconnected earlier in the collection cycle and that a larger number of customers will be disconnected in general. However, the referred testimony addresses a third, separate concern, which relates to the timing of service disconnections and the possibility that a large volume of customers will have services disconnected at or near the same time. Specifically, as an agency that provides utility assistance to customers—who typically reach out for such assistance shortly following their service disconnection—CAC is concerned that a wave of near-simultaneous disconnections will overwhelm its ability to assist these customers in a timely fashion. This would result in more customers, including vulnerable customers such as those who are elderly or disabled, having longer waits before CAC can assist in restoring services. CAC would urge the Company to be mindful of this possibility and to implement practices ensuring that only a limited number of simultaneous service disconnections are performed at any given time.

## CERTIFICATE OF SERVICE

I hereby certify that CAC's June 6, 2018 electronic filing is a true and accurate copy of CAC's Response to Commission Staff's Initial Request for Information, Verification, and Read 1<sup>st</sup> document to be filed in paper medium; that the electronic filing has been transmitted to the Commission on June 6, 2018; that an original and six copies of the filing will be delivered to the Commission on June 6, 2018; that there are currently no parties excused from participation by electronic service; and that, on June 6, 2018, electronic mail notification of the electronic filing is provided to the following:

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