

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

**In the Matter of:**

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

**RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**AND**  
**KENTUCKY UTILITIES COMPANY**  
**TO THE ASSOCIATION OF COMMUNITY MINISTRIES, INC.'S**  
**SECOND REQUESTS FOR INFORMATION**  
**DATED APRIL 27, 2018**

**FILED: MAY 11, 2018**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
  )  SS:  
COUNTY OF JEFFERSON      )

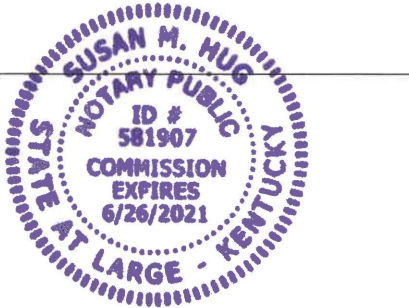
The undersigned, **John P. Malloy**, being duly sworn, deposes and says that he is Vice President – Gas Distribution for Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

*[Handwritten signature in blue ink]*  
\_\_\_\_\_  
**John P. Malloy**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11<sup>th</sup> day of May 2018.

*[Handwritten signature in blue ink]*  
\_\_\_\_\_  
Notary Public                    (SEAL)

My Commission Expires:



**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to the Association of Community Ministries, Inc.'s  
Second Requests for Information  
Dated April 27, 2018**

**Case No. 2018-00005**

**Question No. 1**

**Witness: John P. Malloy**

- Q-1. Please refer to the Responses of Louisville Gas and Electric Company (“LG&E”) and Kentucky Utilities (“KU”) to the Association of Community Ministries’ First Request for Information (“ACM 1”), Question No. 27(a) and Question No.43. Once the Companies implement remote disconnections, all else being equal, do they expect to increase the numbers of residential disconnections for nonpayment they will carry out daily as a result of being less limited by workload and available workforce? Please explain.
- A-1. All other things being equal, the Companies expect the daily numbers of residential disconnections for nonpayment will increase upon implementation of remote disconnection. With that said, everything will not remain equal as customers’ ability to pay fluctuates due to a number of factors.

The Companies have committed to not changing any policy associated with disconnections for non-payment. As such, customers will continue to have the same opportunities to avoid disconnection.

**Louisville Gas and Electric Company and Kentucky Utilities Company**  
**Response to the Association of Community Ministries, Inc.'s**  
**Second Requests for Information**  
**Dated April 27, 2018**

**Case No. 2018-00005**

**Question No. 2**

**Witness: John P. Malloy**

- Q-2. Please refer to the Response to ACM 1-32 relating to the Medical Alert Program (MAP).
- a. Are customers, including members of their household, who are under doctors' orders to continuously be on oxygen covered by the MAP?
  - b. Are customers, including members of their household, who are under doctors' orders to have a daily breathing treatment through a device that requires electricity to operate covered by the MAP?
  - c. Please refer to the Attachment to Response to ACM 1 Question No. 32(c), page 5 of 5, at no. 5 which refers to entry of a manual Disconnect Order. Please explain how the process for entry of a manual Disconnect Order will change after implementation of remote disconnection. Please explain if there will be any other changes to the disconnection process for customers who are covered by the MAP.
- A-2.
- a. Customers that are on life-sustaining devices (generally this is a physician-prescribed ventilator, respirator, or ventricular assist device) that have filed an application with the Companies and the equipment has been verified by the customer's physician, are covered under the MAP program. If the equipment is not one of the qualifying types listed above, the verification letter supplied by the customer's physician is reviewed by the Companies' contracted physicians, U.S. Health Works Medical Group of Kentucky Inc. (formally Occupational Physician Services), for MAP qualification.
  - b. See response to a.
  - c. The manual disconnect order process is not expected to change for customers covered by MAP.

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**Question No. 3**

**Witness: John P. Malloy**

- Q-3. Please refer to the Response to ACM 1-40. Once AMS is deployed, will the Companies offer other options for notification of disconnection (including text and/or email) to customers and other persons designated by customers to receive notification of disconnection?
- A-3. Today the Companies provide customers the opportunity to sign-up for bill notifications via SMS-text, Email and Auto-call. The bill notifications include the following:
- Your bill is ready to view (online) and the amount is \$##.##
  - Your bill of \$##.## is due in 5 days ##/##/##
  - Your bill just went past due (issued the day after the bill is past due before late charges are applied)

Customers requesting bill notifications can sign-up online using their online account or request a Customer Service Representative sign them up by calling or visiting a walk-in center. For either method, the customer then receives a notice via the selected channel (i.e. SMS-text, Email or Auto-call) where they have to confirm they want to receive the notifications. The customer has the ability to opt-out of the notifications at any time by following the instructions on the SMS-text, Email or Auto-call. Federal regulations require the opt-out be conspicuous and not require more than two steps. This method of notifications is described in ACM 1-40 as “Opt-in”.

The “Opt-in” notifications allow customers to designate other persons (e.g. Caretaker) to receive notifications. As stated above, the designated person is still required to complete the opt-in process by confirming the request on the selected device and can opt-out at any time using the same method as the customer of record.

Prior to changes in the Telephone Consumer Protection Act (TCPA), the Companies sent an automated telephone call to customers three days prior to the scheduled disconnect for non-payment date. This method of notifications is described in ACM 1-40 as “Notify All”. The “Notify All” method does not provide the customer the option of designating another person to receive the notification.

To be successful, both methods are dependent upon the customer keeping their contact information up-to-date.

Prior to using the Remote Service Switch to execute disconnections for non-payment and subsequent reconnections, the Companies will re-evaluate the options allowed by federal and state laws. The Companies will also evaluate customer notification preferences and select a method that creates the optimal customer experience.

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**Question No. 4**

**Witness: John P. Malloy**

- Q-4. Please refer to the Response to ACM 1-43. Please provide the attachment in Excel format.
- A-4. See attachment being provided in Excel format.

The attachment is being provided in a separate file in Excel format.