

**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 FOR A CERTIFICATE OF PUBLIC ) CASE NO. 2018-00005  
CONVENIENCE AND NECESSITY FOR FULL )  
DEPLOYMENT OF ADVANCED METERING SYSTEMS )**

**FIRST SET OF DATA REQUESTS OF  
METROPOLITAN HOUSING COALITION  
TO LOUISVILLE GAS & ELECTRIC COMPANY**

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Dated: April 2, 2018

## DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of any memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, or notices, in whatever form, stored or contained in or on whatever medium, including digital media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and business address, and last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), identifying number, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it and why it was so disposed.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these data requests and, to the extent relevant and necessary to

provide full and complete answers to any request, "you" or "your" may be deemed to include any other person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

11. "Company" or "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed, and affiliates including PPL Corporation.

### **INSTRUCTIONS**

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These requests for information are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Metropolitan Housing Coalition. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each data request should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are

requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.

**FIRST SET OF DATA REQUESTS PROPOUNDED TO LOUISVILLE GAS AND ELECTRIC COMPANY BY METROPOLITAN HOUSING COALITION**

**Question 1-1**

With regard to the testimony of Tim Malloy, pages 11-13, referring to the MyMeter program, he cites a survey.

- a. How many households were sent the survey?
- b. Was it 100% of the households who had signed up for the program?
- c. How many households responded to the survey?

**Question 1-2**

In the Advanced Metering sessions, David Huff referred to a percent of people who signed up for MyMeter who actually logged on and utilized the information. What was that percent?

**Question 1-3**

In the pending Demand Side Management/Energy Efficiency case, 20017-00441, LG&E has recommended discontinuing public education as a mechanism for changing personal behavior. What is the basis for concluding, in this case, that there will be savings projected to be had inuring to the general public through changes in behavior?

**Question 1-4**

Please provide, by percentage, the reasons for per capita reductions in usage of electricity during the last five years, and isolate the percentage of those reductions that are attributable to deployment of more efficient appliances, and those ascribed to changes in personal behavior?

**Question 1-5**

On Pages 7 and 8 of the testimony of Tim Malloy, he states that the submission is essentially the same as of two years ago.

- a. Please describe any changes from the previous AMS filing.
- b. During the interim between the withdrawal of the prior AMS filing and the filing of the current case, has the applicant conducted or contracted for the performance of any additional studies concerning the deployment of AMS systems? If so, please identify and provide a copy of such studies.
- c. Please provide the bases for the projected cost savings associated with the deployment of the AMS.

### **Question 1-6**

In the Malloy testimony, reference is made to an article regarding non-technical losses. The article, a 2008 article, Appendix 8 to his testimony, cites studies from 2000 and 2001 and claims that the data estimate is not precise.

- a. Please provide a copy of any studies since 2008 of which applicant is aware that describe methods of collecting data on non-technical losses.
- b. Please provide a copy of any studies since 2008 that show actual changes in non-technical losses solely due to implementation of an Advanced Metering program.

### **Question 1-7**

Please provide any studies developed by other utilities, or developed regarding other utilities' deployment of Advanced Metering Systems.

### **Question 1-8**

The article in Appendix 8 of the Malloy testimony acknowledges, on page 49 and 50 of 112, that AMR does not reveal more information. Is it the testimony of Mr. Malloy that the estimated non-technical savings are estimates based on data collection methods and data from before 2008?

### **Question 1-9**

With respect to the Appendix 8 article, who authored the article, and was the article peer-reviewed?

### **Question 1-10**

While the Appendix 8 article suggests things that might work to bring down non-technical losses using Advanced Metering, it does not supply empirical studies that prove that each element has worked in the field.

With a number of utilities using Advanced Metering, are there studies that show each element and how it has a direct impact on savings for non-technical losses?

- a. Please provide a copy of all such studies reviewed or relied upon in preparation of the filing.

### **Question 1-11**

In the last five years, how many meters have been installed for residential, commercial, and industrial customers?

- a. How many of those are new installation, and how many are replacement meters?
- b. What is the projected useful life of the meters deployed by the utilities in their service areas? Please provide the total number of meters and the range of remaining years of useful life.
- c. What is the remaining value of those meters in monetary terms?
- d. What does the applicant intend to do with meters with remaining useful life that are replaced by Advanced Meters?
- e. Are there remaining capital costs associated with the current meters, how much are those costs, and who will pay for those remaining costs?

### **Question 1-12**

What was the average purchase and installation cost per meter per year for the last ten years?

### **Question 1-13**

What is the life expectancy of the meters as installed within the utility service areas?

### **Question 1-14**

Considering the lost value of meters currently in use that will be retired prior to the end of their useful life,

- a. Will the removal and replacement of those meters with AMS meters bring any savings to the ratepayer?
- b. If so, what are the projected savings, and when and over what time period will those savings be realized?
- c. What are the assumptions on which such projected cost savings rest?

### **Question 1-15**

Will the loss of the value of meters currently in use that will be removed for AMS meters bring any new income to the shareholder? If so, what is that projected increase, by share and in the aggregate, of deployment of the AMS and retirement of current meters?

**Question 1-16**

With respect to the meters to be removed and replaced,

- a. Will the meters that are still operable have any resale value?
- b. If so what will be the formula for determining the resale value, and what is the anticipated aggregate revenue that will be generated from the resale?
- c. Will that revenue be returned to ratepayers, and if not, why not, and how will the revenue be distributed?

**Question 1-17**

Will the LG&E claim the loss of value of those meters be used by LG&E in its taxes?

**Question 1-18**

Is the loss of value of the still-operable meters factored into the cost/savings formula presented in the filing before the Commission?

**Question 1-19**

Please describe what measures will be taken to assure that the privacy of individual ratepayers will be respected in the collection, storage, and utilization of the usage data collected through the AMS?

- a. Please provide any policy or policies that have been developed regarding the use and release of that data to the utility, and to third-parties such as to law enforcement, government agencies or commercial entities?

**Question 1-20**

Please describe whether the AMS system will be used to accelerate utility disconnection for nonpayment, and identify those due process measures that will be developed to protect customers from wrongful disconnection.

**Question 1-21**

The collection of the cost proposed by LG&E will automatically be charged to ratepayers; how will the projected savings over 2018-2040 be allocated to the ratepayers?

**Question 1-22**

What mechanisms/methods/ analysis/reporting does LG&E propose in order to accurately account for and track the savings each year?

**Question 1-23**

What is the method to ensure the savings reach the ratepayers each year?

**Question 1-24**

Should the savings not take place, will LG&E shareholders cover any or all of the difference between what was projected to justify the cost to ratepayers and the savings? Stated alternatively, if the assumptions of savings are not realized, will the risk of non-realization fall entirely on the ratepayers, or will it be shared by the shareholders and if so, under what formula?

Respectfully submitted,



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## CERTIFICATE OF SERVICE

This is to certify that electronic version of the First Set of Data Requests Propounded to Louisville Gas and Electric Company by Metropolitan Housing Coalition 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 April 2, 2018; 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 (6) copies in paper medium of the First Set of Data Requests Propounded to Louisville Gas and Electric Company by Metropolitan Housing Coalition will be delivered by priority mail within two (2) business day of April 2, 2018 to the Commission.



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Tom FitzGerald