

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

FIRST REQUESTS FOR INFORMATION OF
ASSOCIATION OF COMMUNITY MINISTRIES, INC.

In accordance with the procedural schedule established by the Commission by Order entered March 6, 2018, 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 Testimony of John P. Malloy (“Malloy Testimony”) at page 15, line 9 which refers to a projected peak bill impact of \$2.60 per month for the average residential customer. Please provide the projected peak bill impact separately for Louisville Gas and Electric Company (“LG&E”) electric and Kentucky Utilities Company (“KU”) and provide the projected peak bill impact for the average residential LG&E gas customer.
2. Please refer to the Malloy Testimony at page 17, lines 14 through 16. Please state the basis for the following assumption: “[t]he Companies then assumed with full deployment of AMS (less opt-outs) that 60% of actual non-technical losses would be identified and billed...”
3. Please refer to the Malloy Testimony at page 19, lines 15 through 17 stating “[a]ccording to Tetra Tech, current active users of MyMeter are achieving energy savings on the order of 3.8%, resulting in bill savings of roughly 3.3% based on the Companies’ calculations.” Please provide the calculations of the 3.3% bill savings.
4. Please refer to the Malloy Testimony at page 11, lines 12 through 14 in which he refers to the AMS Customer Service Offering (referred to herein as “AMS Opt-In Program”).
 - a. Please describe the information that customers who wish to participate in the AMS Opt-In Program are required to provide to the Companies.
 - b. Please describe any information that customers who wish to participate in the AMS Opt-In Program are asked, but not required, to provide to the Companies.

- c. Please describe any demographic data that the Companies have on:
 - i. Customers who have enrolled in the AMS Opt-In Program, and
 - ii. Customers who have enrolled in the AMS Opt-In Program who have had an AMS Meter installed.
5. Please provide the numbers of AMS enrollees as of March 31, 2018 broken down by Company, and for each Company, by customer class.
6. Please provide the numbers of LG&E residential customers enrolled in the AMS Opt-In Program as of March 31, 2018:
 - a. who have had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of customer enrollments in June, 2015 and ending March 31, 2018; and
 - b. who have had more than one bill payment made by third-party assistance providers during the period beginning twelve months prior to the start of customer enrollments in June, 2015 and ending March 31, 2018.
7. Please provide in Excel format a breakdown of the number of LG&E residential customers who have enrolled in AMS as of March 31, 2018 by zip code.
8. Please refer to the AMS Opt-In Online Customer Survey (“2017 Customer Survey”) attached as Appendix A-9 to the AMS Business Case, Exhibit JPM-1. Please provide a breakdown of the number of LG&E residential customers who have enrolled in AMS as of March 31, 2018, according to the following categories used by the 2017 Customer Survey to collect demographic data:
 - a. Residence (own or rent)
 - b. Age Range

- c. HH Income Level
 - d. Education Level.
9. In the Companies' Advanced Metering Systems 2017 Annual Report, filed with the Commission January 31, 2018, pursuant to an Order in Case No. 2014-00003¹, at page 4, the Report states "the participation numbers listed above are not inclusive of customers who move out (860 customers), resulting in an AMS meter removal if the move out occurs after the AMS meter was installed." Please explain why the AMS meters are removed.
10. In the Companies' Advanced Metering Systems 2017 Annual Report, filed with the Commission January 31, 2018, pursuant to an Order in Case No. 2014-00003², at page 4, the Report states "The participation numbers also do not include customers who request to cancel their enrollment before their meter gets installed (195 customers) or opt out of the AMS offering after their meter is installed (23 customers)."
- a. Please provide the total number of LG&E customers as of March 31, 2018 who have requested to cancel their enrollment in the AMS Opt-In Program before their meter was installed. Please break down the numbers of such customers by:
 - i. customer class
 - ii. zip code in Excel format
 - iii. reason for the cancellation request.

¹ Case No. 2014-00003, Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of New Demand-Side Management and Energy Efficiency Programs (Ky. PSC, Nov 14, 2014).

² Case No. 2014-00003, Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of New Demand-Side Management and Energy Efficiency Programs (Ky. PSC, Nov 14, 2014).

- b. Please provide the total number of LG&E customers as of March 31, 2018 who have opted out of the AMS Opt-In Program after their meter was installed. Please break down the numbers of such customers by:
 - i. customer class
 - ii. zip code in Excel format
 - iii. reason for the opt out request.

- 11. Please refer to the Malloy Testimony at Page 25 lines 5 through 9 in which he states “[f]irst, as current AMS participants already can, all customers with Internet access will be able to ... explore different products and programs that may align to their needs.” Please describe how AMS Opt-In participants have been able to explore the different products and programs referred to by Mr. Malloy and what products and programs he is referring to.

- 12. Please provide the numbers of LG&E AMS Opt-in participants as of March 31, 2018, who after receiving an AMS meter, also started to participate in one or more of the Companies’ Demand-Side Management and Energy Efficiency (DSM/EE”) Programs.

- 13. Please provide a breakdown by DSM/EE Program of the numbers of LG&E DSM/EE Program participants as of March 31, 2018, who started participating in a DSM/EE Program after receiving an AMS meter through the AMS Opt-In Program.

- 14. Please refer to the Malloy Testimony at page 12, lines 13 through 16 which states “[t]he Companies have found that customers participating in the AMS Customer Offering are geographically diverse, spanning various topographies, population densities, and socio-economic segments throughout the Companies’ Kentucky service territories.” Please provide the basis for the reference to socio-economic diversity.

15. Please refer to the AMS Opt-In Online Customer Survey attached as Appendix A-9 to Exhibit JPM-1 (“2017 Customer Survey”) at page 2 and describe the LG&E and KU Proprietary Customer Panel (“Panel”), including its purpose, function, membership qualifications, membership term and how members are recruited.
 - a. Please provide a breakdown of the Panel by Company, and for each Company by customer class as of the date of the survey invite.
 - b. Please describe any demographic data that the Companies have on residential members of the Panel.
16. Was the 2017 Customer Survey sent to all members of the Panel? If not, please describe how recipients of the invite were selected.
17. Please provide breakdowns of the LGE and KU customers who completed the 2017 Customer Survey, separately by customer class.
18. Please refer to the AMS Opt-In Online Customer Survey (“2017 Customer Survey”) attached as Appendix A-9 to Exhibit JPM-1. Please provide a breakdown of the number of LG&E residential customers who completed the Survey, according to the following categories used by the 2017 Customer Survey to collect demographic data:
 - a. Residence (own or rent)
 - b. Age Range
 - c. HH Income Level
 - d. Education Level.
 - e. Please provide the number of LG&E residential customers who completed the Survey who had a bill payment made by a third-party assistance provider during

the period beginning twelve months prior to the start of customer enrollments in June, 2015 and ending March 31, 2018.

- f. Please provide in Excel format a breakdown of the number of LG&E residential customers who completed the Survey by zip code.
19. Please provide a copy of the survey instrument used to conduct the AMS Opt-In Online Customer Survey attached as Appendix A-9 to Exhibit JPM-1.
 20. Please refer to the AMS Opt-In Online Customer Survey (“2017 Customer Survey”) attached as Appendix A-9 to Exhibit JPM-1. Throughout the Survey where the Survey shows “N= ___” please describe the number provided after the “N=” See, for example, page 8 showing “N=1,070” and page 10 showing “N=87.”
 21. Please refer to the 2017 Customer Survey attached as Appendix A-9 to Exhibit JPM-1 at page 8 and break down the numbers of households constituting the 8% of Households participating by Company and for each Company by customer class.
 - a. Please provide a breakdown of the number of LG&E residential households included in the 8% of Households participating, according to the following categories used by the 2017 Customer Survey to collect demographic data:
 - i. Residence (own or rent)
 - ii. Age Range
 - iii. HH Income Level
 - iv. Education Level.
 - b. Please provide the numbers of LG&E residential households included in the 8% of Households participating, who had a bill payment made by a third-party

assistance provider during the period beginning twelve months prior to the start of customer enrollments in June, 2015 and ending March 31, 2018.

- c. Please provide in Excel format a breakdown of the number of LG&E residential households included in the 8% of Households participating by zip code.
22. Please refer to the chart entitled Frequency of Use: MyMeter Dashboard at page 10 of the 2017 Customer Survey, Appendix A-9 to Exhibit JPM-1 and for each percentage, provide the number of LG&E households included in the percentages shown by customer class.
- a. For each percentage listed please provide breakdowns of the numbers of LG&E residential households included in the percentages, according to the following categories used by the 2017 Customer Survey to collect demographic data:
 - i. Residence (own or rent)
 - ii. Age Range
 - iii. HH Income Level
 - iv. Education Level.
 - b. For each percentage listed please provide breakdowns of the numbers of LG&E residential households included in the percentage, who had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of customer enrollments in June, 2015 and ending March 31, 2018.
 - c. For each percentage listed please provide in Excel format a breakdown of the numbers of LG&E residential households included by zip code.

23. Please refer to the chart entitled Reductions of Energy Consumption at page 13 of the 2017 Customer Survey, Appendix A-9 to Exhibit JPM-1 and for each percentage listed, provide the numbers of LG&E households included in the percentages shown by customer class.
- a. For each percentage listed please provide breakdowns of the numbers of LG&E residential households included in the percentages according to the following categories used by the 2017 Customer Survey to collect demographic data:
 - i. Residence (own or rent)
 - ii. Age Range
 - iii. HH Income Level
 - iv. Education Level.
 - b. For each percentage listed please provide breakdowns of the numbers of LG&E residential households included in the percentages, who had a bill payment made by a third-party assistance provider during the period beginning twelve months prior to the start of customer enrollments in June, 2015 and ending March 31, 2018.
 - c. For each percentage listed, please provide in Excel format breakdowns of the numbers of LG&E residential households included in the percentages by zip code.
24. Have the Companies done any other surveys or studies of the AMS Opt-In program participants other than those provided as part of this case? If so, please describe the surveys and results and provide copies.
25. Please refer to the Testimony of Rick E. Lovekamp (“Lovekamp Testimony”) at page 3, lines 14 to 15 which states “[t]he Companies are not proposing to change any of their

service disconnection or reconnection policies due to AMS.” Please provide complete copies of all current LG&E service disconnection and reconnection policies. If any policies are contained in LG&E’s tariffs please provide copies of the relevant sheets rather than the entire tariff.

26. Please provide a current copy of the LG&E, KU, ODP Credit and Collection Policy Manual.

27. Please describe in detail LG&E’s current procedures for disconnections of residential customers for nonpayment, including each step involved from issuance of the regular bill to actual disconnection. In the description, please identify whether steps are automated or carried out by personnel or contractors. Please include the following:

- a. how and when disconnections are scheduled, including:
 - i. the timeframes during which LG&E carries out disconnections;
 - ii. who schedules disconnections, such as personnel, contractor or automated procedure;
 - iii. how many are normally scheduled and carried out each day;
 - iv. any numerical limits on how many can be scheduled or carried out in a day; and
 - v. any factors that may affect scheduling such as the time of year or weather;
- b. the role that location of the customer’s premises plays in the disconnection process, for example whether regular bill due dates and/or brown bill due dates are arranged by neighborhood, zip code or other geographic region so that customers subject to disconnection on the same date are in the same vicinity;

- c. any differences resulting from whether the customer's service is electric only, gas only or combined gas and electric;
- d. in the event that a combined customer's gas and electric are subject to disconnection, whether the disconnections of both services are carried out at the same time, and if not, the reasons for the difference in timing;
- e. any procedures applicable to circumstances that a service technician carrying out a disconnection order may encounter on the customer's premises, such as customers stating that they have already paid or have an appointment with an assistance agency or potential customer safety situations such as unattended children on the premises or disabled customers; and
- f. whether there are circumstances in which a service technician has the authority to not carry out a disconnection, and if so, please describe any such circumstances.
- g. Please provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in the procedures relating to disconnections of residential customers for nonpayment.
- h. Please describe how each of the procedures described above will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.

28. Please refer to the Lovekamp Testimony at page 4, lines 10 through 16 in which he refers to a provision in the Companies' tariffs extending the timeframe for disconnections when a customer presents a medical certificate.
- a. Please provide complete copies of any LG&E policies relating to this provision in the tariffs, and which are not included in response to Question 25 above. If any policies are contained in LG&E's tariffs please provide copies of the relevant sheets, rather than the entire tariff.
 - b. Describe in detail the current procedures for implementation of this provision, including what steps are carried out by personnel or contractors and what steps are automated. Please include how the LG&E ensures that customers are not disconnected during the thirty day extension period.
 - c. Please provide copies of any operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in these procedures.
 - d. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.
29. Please refer to the Lovekamp Testimony at page 4, lines 22 through 24 in which he refers to the Commission's regulations concerning refusal or termination of service.
- a. Please provide complete copies of any LG&E policies relating to the Commission's regulations concerning refusal or termination of service, and which

are not included in response to Question 25 above. If any policies are contained in LG&E's tariffs, please provide copies of the relevant sheets rather than the entire tariff.

- b. Describe in detail the current procedures for implementation of the Commission's regulations concerning refusal or termination of service, including what steps are carried out by personnel or contractors and what steps are automated. Please include how LG&E ensures that customers are not disconnected in violation of these regulations, such as when a payment has been made, when a partial payment plan is in effect and when a certificate of need has been presented.
 - c. Please provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in these procedures.
 - d. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.
30. Please refer to the testimony of Rick Lovekamp at pages 4 through 5 referring to the Companies' cold weather disconnection policy.
- a. Provide a complete copy of this policy including any other weather-related policies, such as a hot weather disconnection policy and which are not included in response to Question 25 above. If any policies are contained in LG&E's tariffs, please provide copies of the relevant sheets rather than the entire tariff.

- b. Please describe in detail LG&E's current procedures for implementation of this and any other weather related policy, including what steps are carried out by personnel or contractors and what steps are automated. Please include how LG&E ensures that non-payment disconnections:
 - i. are not initiated when the National Weather Service (NWS) predicts a daily high temperature below 32 degrees for a 24 hour period, or
 - ii. do not occur on the last work day of the week when the weekend forecast calls for temperatures that fall below 32 degrees, or
 - iii. are suspended during the work day should temperatures abruptly drop below the original NWS forecast, or
 - iv. do not occur during conditions described in any other weather related policy.
- c. Please describe how the NWS forecast is monitored.
- d. Please describe whether this and any other weather related policy is always followed or is subject to discretion and if subject to discretion, what guidelines apply to the exercise of any discretion and who has authority to exercise discretion under such policy.
- e. Please describe the procedure that goes into effect if the weather forecast changes so that previously scheduled disconnections need to be cancelled per this and any other weather related policy.
- f. Please provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in these procedures.

- g. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.
 - h. Once remote disconnection is implemented, will there be any change in how LG&E retrieves or enters NWS data? For example, will the computer system retrieve the NWS data or will a person be required to enter it into the system?
- 31.
- a. Provide complete copies of any LG&E policies pertaining to disconnection when the Companies receive payments or pledges made by third party agencies and which are not included in response to Question 25 above. If any policies are contained in LG&E's tariffs, please provide copies of the relevant sheets rather than the entire tariff.
 - b. Please describe in detail LG&E's current procedures applicable to disconnections when a customer receives a pledge or payment from a third party agency including what steps are carried out by personnel or contractors and what steps are automated. Please include how LG&E ensures that customers are not disconnected during any period of time for which the disconnection is postponed or service is guaranteed.
 - c. If not included in the responses to (a) and (b) of this question, please provide the information requested by (a) and (b) pertaining to the situation in which a customer notifies LG&E that he or she has an appointment with a third party agency which falls after the disconnection date listed on the disconnection notice.

- d. Please provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in these procedures.
 - e. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.
- 32.
- a. Please provide complete copies of any LG&E policies relating to disconnection of service for customers who are on the Companies' Medical Alert Program or who have notified LG&E of a medical necessity for service, such as a respirator, and which are not included in response to Question 25 above. If any policies are contained in LG&E's tariffs, please provide copies of the relevant sheets rather than the entire tariff.
 - b. Please describe in detail LG&E's current procedures for disconnections of service for customers who are on the Companies' Medical Alert Program or who have notified LG&E of a medical necessity, including what steps are carried out by personnel or contractors and what steps are automated. Please include how LG&E ensures that customers are not disconnected in violation of its policies or procedures.
 - c. Provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in these procedures.

- d. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.
- 33.
- a. Please provide complete copies of any other LG&E policies which provide protection to customers who have received a disconnection notice, and which are not included in response to Questions 25 through 32 above. If any policies are contained in LG&E's tariffs, please provide copies of the relevant sheets rather than the entire tariff.
 - b. Please describe in detail LG&E's current procedures for implementation of any policies provided in response to part (a) of this question, including what steps are carried out by personnel or contractors and what steps are automated. Please include how LG&E ensures that customers are not disconnected in violation of such policies or procedures.
 - c. Please provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way in the procedures described in this question.
 - d. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.

34.
 - a. Please describe any current LG&E review or quality control procedures in place to ensure that customers are not erroneously disconnected.
 - b. Please provide copies of any LG&E operating procedures, instructions and training materials for company personnel or contractors who are involved in any way with such quality control procedures.
 - c. Please describe how each of the procedures described in response to this question will change as a result of LG&E's implementation of remote disconnection of service. Please specify any procedural changes that are anticipated but have not been developed. If new operating procedures, instructions or training materials have been developed, please provide copies.
 - d. For each customer erroneously disconnected in the LG&E territory during the period from January 1, 2017 through March 31, 2018, please provide the customer zip code, the month of disconnection and the reason(s) for the error. Please provide this in Excel format.
35. From a technical point of view, please describe how remote disconnections will work including how this process will interface with other Company computer systems.
36. Please refer to the Testimony of David E. Huff ("Huff Testimony") at Page 9.
 - a. Please list and describe the changes in current processes that could result from Remote Service Switching referred to by Mr. Huff in lines 12 to 14.
 - b. Please list and describe the potential future processes referred to by Mr. Huff in line 20.
 - c. Please provide an update on the current status of any changes in current processes that could result from Remote Service Switching or potential future processes

relating to disconnections that were discussed in the AMS Collaborative including but not limited to:

- i. a description of any further development or refinement of any possible changes that were discussed in the AMS Collaborative;
- ii. a description of any new possible changes that the Companies have developed since the AMS Collaborative; and
- iii. a description of any decisions LG&E has made about any possible changes either discussed at the Collaborative or developed afterwards.

37. Please refer to Exhibit DEH-4 page 33 entitled Current Disconnection Notice Process.

- a. For each step on the chart please describe how the step is carried out and by whom (e.g. personnel, contractor, other individuals or automated procedure.) For steps carried out by personnel, contractors or other individuals, please identify the job title. For steps carried out by automated procedure, please describe the procedure. Please specify any steps that require personnel, contractors or other individuals to enter information in the CIS or other Company systems.
- b. Please describe how and by whom (e.g. personnel, contractor, other individuals or automated procedure) payment information is entered into the CIS or other Company system so that the Companies know whether payment has been received within 16 days after the bill being sent or 10 days after the Brown Bill being sent or before the service technician gets to the disconnection location.
- c. Please describe the reason or reasons that service technicians do not get to the account within the 4 day window.

- d. Please describe whether all disconnections go through the process described on this chart or if there are any exceptions. Please describe the reasons for any exceptions and the percentage of any exceptions.
 - e. Please describe how and by whom (e.g. personnel, contractor, other individuals or automated procedure) information that would affect the disconnection process (such as a customer having an appointment with an assistance agency, pledge being made, certificate of need, payment plan or medical certificate) is entered into the CIS or other Company system so that an erroneous disconnection does not take place.
38. Please refer to Exhibit DEH-4 page 33 entitled Current Disconnection Notice Process:
- a. After the Companies implement remote disconnections, for each step on the chart, as well as any additional steps that may be added, please describe how the step will be carried out and by whom (e.g. personnel, contractor, other individuals or automated procedure including advanced meter.) For steps that will be carried out by personnel, contractors or other individuals, please identify the job title. For steps that will be carried out by automated procedure, including advanced meter, please describe the procedure. Please specify any steps that will require personnel, contractors or other individuals to enter information in the CIS or other Company systems.
 - b. After the Companies implement remote disconnections, please describe how and by whom (e.g. personnel, contract or other individual or automated procedure) payment information will be entered into the CIS or other Company system so that the Companies will know whether payment has been received within 16 days

after the bill being sent or 10 days after the Brown Bill being sent or before the service technician gets to the disconnection location.

- c. After the Companies implement remote disconnections, please describe how and by whom (e.g. personnel, contractor, other individuals or automated procedure.) information that would affect the disconnection process (such as a customer having an appointment with an assistance agency, pledge being made, certificate of need, payment plan or medical certificate) will be entered into the CIS or other Company system so that an erroneous disconnection does not take place.
 - d. Please describe whether a Customer Service Representative will have the ability to stop remote disconnection upon receipt of information that would affect the disconnection process such as a medical certificate, and if so, how.
 - e. Under what circumstances will a Customer Service Representative have the ability to override a pending remote disconnection and prevent a remote disconnection before it takes place?
39. Please refer to Exhibit DEH-4 page 34 entitled LKE Disconnect Service Orders- Illustrative Breakout.
- a. Please confirm that the percentages on the pie chart represent the letters on the right hand side of the page, (40% service orders canceled due to payment pledge or other received, 10% service orders canceled due to service order stale or dated and 50% service disconnected).
 - b. Please provide the numbers associated with each percentage listed on the pie chart broken down by Company.

- c. Please provide a similar chart for 2017 and the numbers associated with each percentage listed on the 2017 pie chart, broken down by Company.
- 40. Please refer to Exhibit DEH-4 page 39
 - a. Please describe the Companies' plans regarding the timing and notification issues raised by each of the questions listed on this page including whether the Companies have made decisions on any of these issues.
 - b. If plans are not final, please describe the options that the Companies are considering with respect to each issue.
- 41. Please refer to Exhibit DEH-6 at page 8, the first bullet point under the Remote Service Switch heading. Please describe the current status of the Companies' future plans and processes to increase education and awareness on service disconnections and to consider providing notice of disconnects through a variety of communication means such as text messages, phone calls and mail.
- 42. Please refer to Exhibit DEH-6 at page 8, the second bullet point under the Remote Service Switch heading. Please describe in detail the plan to use a temporary procedure that has manual review and human intervention components for an initial period to fine tune any internal business logic and avoid unnecessary disconnections. If the plan has not been finalized, please describe options that the Companies are considering.
- 43. Please provide the number of disconnections for nonpayment carried out each day from January 1, 2017 through June 30, 2017 in the LG&E territory, broken down by zip code.

44. What are the current estimates on how much disconnect and reconnect fees will change after implementation of remote service switching and at what point, in relation to the implementation of remote service switching they would change?

Respectfully submitted,



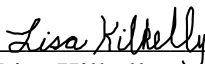
Lisa Kilkelly
Eileen L. Ordover
LEGAL AID SOCIETY, INC.
416 W. Muhammad Ali Blvd., Ste. 300
Louisville, Kentucky 40202
Telephone: (502) 584-1254
Facsimile: (502) 584-8014
Email: LKilkelly@laslou.org
EOrdover@laslou.org

Counsel for ACM

Dated: April 2, 2018

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s April 2, 2018 electronic filing of the foregoing First 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 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 copies in paper medium are being mailed to the Commission via Express Mail on April 2, 2018.



Lisa Kilkelly