# **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

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## In The Matter Of:

ELECTRONIC JOINT APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY FOR FULL DEPLOYMENT OF ADVANCED METERING SYSTEMS

CASE NO. 2018-00005

## <u>SECOND REQUESTS FOR INFORMATION OF</u> <u>ASSOCIATION OF COMMUNITY MINISTRIES, INC.</u>

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**

- 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.
- 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.

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- 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?
- 4. Please refer to the Response to ACM 1-43. Please provide the attachment in Excel format.

Respectfully submitted,

<u>Lisa Kilkelly</u> Lisa Kilkelly

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Counsel for ACM

Dated: April 27, 2018

#### **CERTIFICATE OF COMPLIANCE**

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s April 27, 2018 electronic filing of the foregoing Second 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 27, 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 27, 2018.

Lisa Kilkelly