

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
UTILITIES COMPANY FOR AN ADJUSTMENT) CASE NO. 2018-00294
OF ITS ELECTRIC RATE)

**COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE, BOURBON,
HARRISON, AND NICHOLAS COUNTIES, INC.'S INITIAL REQUEST FOR
INFORMATION TO KENTUCKY UTILITIES COMPANY**

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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 Initial Request for Information to Kentucky Utilities Company (hereinafter "KU").

GENERAL INSTRUCTIONS

- (1) Please identify the company witness or witnesses 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, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.
- (4) 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 of the privilege.
- (5) 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.

REQUEST FOR INFORMATION

(1) Please provide a list of the counties in Kentucky in which KU operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.

(2) Please provide a list of the Zip Codes in which KU operates and the current number of residential customers in each. If possible, provide this data in the form of an Excel spreadsheet.

(3) How many KU residential customers received bill paying assistance from a third party agency in each of the years 2014, 2015, 2016, 2017, and the first 10 months of 2018?

(4) (a) For each of the years 2014, 2015, 2016, 2017, and the first 10 months of 2018, please provide the number of KU residential customers in each county in which KU operates that received bill payment assistance from a third party assistance agency at least once. If possible, provide this data in the form of an Excel spreadsheet.

(b) Please provide the average amount of the assistance per customer for the counties and years in (a).

(5) (a) For each of the years 2014, 2015, 2016, 2017, and the first 10 months of 2018, please provide the number of KU residential customers in each zip code in which KU operates that received bill payment assistance from a third party assistance agency at least once.

(b) Please provide the average amount of the assistance per customer for the zip codes and the years in (a). If possible, provide this data in the form of an Excel spreadsheet.

(6) (a) Please provide the number of KU residential customers who made at least one late payment in each of the years 2014, 2015, 2016, 2017, and the first 10 months of 2018.

(b) Please additionally provide the information requested in (a) for each county in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.

(c) Please additionally provide the information requested in (a) for each zip code in which KU operates. If possible, provide this data in the form of an Excel spreadsheet.

(7) (a) How many KU residential customers received disconnect notices in each year 2014, 2015, 2016, 2017 and the first 10 months of 2018?

(b) How many Kentucky Utilities Company residential customers received disconnect notices in each year 2014, 2015, 2016, 2017 and the first 10 months of 2018 in each county in which Kentucky Utilities Company operates? If possible, provide this data in the form of an Excel spreadsheet.

(c) Please provide the number of accounts in (b) where assistance from a third party assistance agency prevented the disconnection.

(8) (a) How many KU residential accounts were disconnected for nonpayment in each year 2014, 2015, 2016, 2017, and the first 10 months of 2018?

(b) Of the accounts in the answer in (a) above, how many of those were disconnected for non-payment more than one time?

(9) (a) How many KU residential accounts were disconnected for nonpayment in each year 2014, 2015, 2017 and the first 10 months of 2018 in each county in which KU operates? If possible, provide this data in the form of an Excel spreadsheet.

(b) Please provide the number of accounts in (a) that had service reinstated with assistance from a third party assistance agency.

(10) (a) How many KU residential accounts were disconnected for non-payment in each year 2014, 2015, 2016, 2017, and the first 10 months of 2018 in each zip code in which KU operates? If possible, provide this data in the form of an Excel spreadsheet.

(b) Please provide the number of accounts in (a) that had service reinstated with assistance from a third party assistance agency.

(11) How many KU customers paid a reconnect fee in the past 12 months?

(12) Please provide the average KU customer monthly invoice amount for each year 2014, 2015, 2016, and 2017.

(13) Please provide the average KU customer monthly invoice amount for KU residential customers for each of the past 12 months.

(14) Please provide the monthly customer charge in effect for KU residential customers for each year 2014, 2015, 2016, 2017, and 2018?

(15) Please provide the average annual usage for KU residential customers for each of the years 2014, 2015, 2016, and 2017.

(16) For each of the years 2014, 2015, 2016, and 2017, please provide the average annual usage for KU residential customers who received assistance from a third party assistance agency during the year in question.

(17) How many KU electric meters are subject to the HEA charge?

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that CAC's November 13, 2018 electronic filing is a true and accurate copy of CAC's Initial Request for Information to Kentucky Utilities Company to be filed in paper medium; that the electronic filing will be transmitted to the Commission; that an original and copy of the filing will be delivered to the Commission; that there are currently no parties excused from participation by electronic service; and that, on November 13, 2018, electronic mail notification of the electronic filing is provided to the following:

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