

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

**In the Matter of:**

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

**RESPONSE OF**  
**KENTUCKY UTILITIES COMPANY**  
**TO**  
**CAC'S INITIAL REQUEST FOR INFORMATION**  
**DATED NOVEMBER 13, 2018**

**FILED: NOVEMBER 29, 2018**

**VERIFICATION**

**COMMONWEALTH OF KENTUCKY** )  
 )  
**COUNTY OF JEFFERSON** )

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, for Kentucky Utilities Company and 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.

  
\_\_\_\_\_  
**Robert M. Conroy**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 29th day of November 2018.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

**Judy Schooler**  
**Notary Public, ID No. 603967**  
**State at Large, Kentucky**  
**Commission Expires 7/11/2022**

VERIFICATION

COMMONWEALTH OF KENTUCKY )  
 )  
COUNTY OF JEFFERSON )

The undersigned, **Elizabeth J. McFarland**, being duly sworn, deposes and says that she is Vice President, Customer Services for Louisville Gas and Electric Company and Kentucky Utilities Company and an employee of LG&E and KU Services Company, and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

  
**Elizabeth J. McFarland**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 29<sup>th</sup> day of November 2018.

  
Notary Public

My Commission Expires:

10-16-2020

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 1**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-1. See the attachment being provided in Excel format.

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

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 2**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-2. See the attachment being provided in Excel format.

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

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 3**

**Responding Witness: Elizabeth J. McFarland**

Q-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?

A-3. See table below.

Year	Unique Residential Customers Receiving Bill Payment Assistance from Third Party Agency
2014	29,318
2015	27,909
2016	27,331
2017	27,480
First 10 months of 2018	19,329



**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 4**

**Responding Witness: Elizabeth J. McFarland**

Q-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).

A-4.

- (a) See the attachment being provided in Excel format.
- (b) See the attachment being provided in Excel format.

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

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 5**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-5.

- (a) See the attachment being provided in Excel format.
- (b) See the attachment being provided in Excel format.

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

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 6**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-6.

(a)

Number of KU residential customers who made at least one late payment within the year

Year	2014	2015	2016	2017	2018 Oct YTD
Total	223,957	226,856	227,820	225,473	208,034

- (b) See the attachment being provided in Excel format.
- (c) See the attachment being provided in Excel format.

The attachments are  
being provided in  
separate files in Excel  
format.

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 7**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-7.

- (a) The following list contains the number of residential customers who received disconnect notices.

2014	177,148
2015	178,014
2016	174,236
2017	170,935
2018 (Jan – Oct)	165,815

- (b) See the attachment being provided in Excel format.
- (c) The Company does not maintain the requested data.

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



**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 8**

**Responding Witness: Elizabeth J. McFarland**

Q-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?

A-8.

	Number of Disconnects				
	2014	2015	2016	2017	2018 (Jan-Oct)
(a) Total residential accounts that were shut off	81,844	79,761	82,021	80,847	71,558
(b) Total accounts disconnected more than once	16,968	16,351	17,033	17,111	14,469

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 9**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-9.

- (a) See the attachment being provided in Excel format.
- (b) The Company does not maintain records in the manner requested in part (b) above. The Company has provided a count of reconnections where an account was reconnected and received a pledge in the same year.

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

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
Dated November 13, 2018**

**Case No. 2018-00294**

**Question No. 10**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-10.

- (a) See the attachment being provided in Excel format.
- (b) The Company does not maintain records in the manner requested in part (b) above. The Company has provided a count of reconnections where an account was reconnected and received a pledge in the same year.

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

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 11**

**Responding Witness: Elizabeth J. McFarland**

Q-11. How many KU customers paid a reconnect fee in the past 12 months?

A-11. For the 12 months ending October 31, 2018, 49,303 KU customers paid a reconnect fee.

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 12**

**Responding Witness: Elizabeth J. McFarland**

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

A-12. Below is the average monthly invoice and consumption for KU residential customers for each year 2014 through 2017.

Year	2014	2015	2016	2017
Residential \$	\$118.72	\$115.71	\$115.65	\$115.62
Residential kWh	1,264	1,195	1,161	1,086

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 13**

**Responding Witness: Elizabeth J. McFarland**

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

A-13. Below is a breakdown of the average KU residential customer invoice amount for the past 12 months (Nov 2017 to Oct 2018).

Calendar Year/Month	Average Invoice \$	Average kWh
Nov-17	\$97.18	881
Dec-17	\$136.82	1,284
Jan-18	\$208.65	2,001
Feb-18	\$158.91	1,463
Mar-18	\$121.29	1,098
Apr-18	\$116.05	1,116
May-18	\$97.89	922
Jun-18	\$115.35	1,124
Jul-18	\$134.13	1,322
Aug-18	\$120.91	1,194
Sep-18	\$118.01	1,178
Oct-18	\$99.17	964



**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 14**

**Responding Witness: Robert M. Conroy**

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

A-14. The table below provides the monthly residential customer basic service charge in effect for the years 2014-2018.

<b>Year</b>	<b>Monthly Basic Service Charge</b>
2014	\$10.75
2015	\$10.75
2016	\$10.75
January 2017	\$10.75
July 2017	\$12.25
2018	\$12.25

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 15**

**Responding Witness: Elizabeth J. McFarland**

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

A-15. Below is the average annual usage for KU residential customers for each year 2014 through 2017.

Year	2014	2015	2016	2017
Residential kWh	15,168	14,340	13,932	13,032

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 16**

**Responding Witness: Elizabeth J. McFarland**

Q-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.

A-16. Below is the average annual usage for KU residential customers who received assistance from a third party assistance agency for each year 2014 through 2017.

Year	2014	2015	2016	2017
Residential kWh	16,767	15,726	14,710	13,998

**KENTUCKY UTILITIES COMPANY**

**Response to CAC's Initial Request for Information  
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**Case No. 2018-00294**

**Question No. 17**

**Responding Witness: Elizabeth J. McFarland**

Q-17. How many KU electric meters are subject to the HEA charge?

A-17. Per the KU tariff book, HEA is assessed to Residential customers only. Therefore, as of October 31, 2018, there are 435,754 KU residential customers subject to the HEA charge.