

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

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND ELECTRIC)	CASE NO.
COMPANY FOR AN ADJUSTMENT OF ITS)	2018-00295
ELECTRIC AND GAS RATES)	

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

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Dated: December 12, 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.

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

Question 1-1 In response to MHC's First Set of Data Requests, Question 1-e, William Seelye is the authority cited on splitting the electric charge into several components. The reasoning, as cited in the Response by LG&E in A-1 e, is that ... "it is his opinion and belief that more information available to customers will lead to a greater understanding on the part of the customers."

Mr. Seelye listed his credentials in page 9 Of 439.

- a. In addition to those credentials, does Mr. Seelye have a degree in education, communications, cognitive science, psychology or marketing?
- b. What studies did Mr. Seelye use to arrive at his opinion and belief that consumers would have a better understanding if the charges were split into several components? If he relied on no studies, what empirical basis exists that he relied on in forming his opinion?
- c. Was the goal of having a better understanding a level of control over usage and/or the ability to lower usage?
- d. What, if any, focus groups did Mr. Seelye conduct to arrive at his opinion and belief?
- e. Why did Mr. Seelye not use the experience of having the gas charge in several components to see if LG&E customers understood their gas bill better?

Question 1-2 The answer provided to Q-8 of MHC's First Set of Data Requests on how rates would affect the behavior of investing in solar energy is that "...the clear impact will be to maintain or increase the current incentive..." In the answer to Question Q-7 of MHC's First Set of Data Requests on what the rate would be if more of the increase was in the kWh instead of the meter charge, the answer was that the kWh

charge would be \$0.9851 in order to collect the same revenue. The proposed rate, as stated in the answer to Q-8 is \$0.9420.

- a. Is it not true that the difference in kWh would enable the investment in solar energy to be recovered sooner?
- b. Is it not true that more people would consider solar investment if more of the increase were in the kWh charge?
- c. Is it not true that residential customers would have a greater incentive to lower their usage if more of the increase were in the kWh charge?
- d. Is it not true that changes in the kWh charge gives people more opportunity and incentive over their bill than raising the meter charge?

Question 1-3 MHC requested information on the percentage of increase and dollar increase in cost for a homebound person who has one 5,000 BTU window air conditioner that is five years old, running continuously to cool 200 square feet in August with the temperature of the day ranging from 75 degrees as a low to 97 degrees as a high for a thirty-one day period. LG&E declined to answer, asserting that it lacked such an analysis.

- a. MHC requests disclosure of any studies that has LG&E commissioned or used to determine if the proposed rates and rate structure will have a deleterious effect on those who are disabled and/or homebound?
- b. What steps does LG&E propose to ameliorate those deleterious effects?

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that electronic version of this Supplemental Set of Data Requests of Metropolitan Housing Coalition to Louisville Gas and Electric Company 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 December 12, 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 one copy in paper medium of the Supplemental Set of Data Requests of Metropolitan Housing Coalition to Louisville Gas and Electric Company will be filed with the Commission within two days of December 12, 2018.



Tom FitzGerald