

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

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

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

Association of Community Ministries, Inc. (“ACM”), by counsel, hereby submits its
Second Requests for Information to Louisville Gas and Electric Company (“LG&E”).

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.

(7) These requests shall be deemed continuing so as to require further and supplemental responses if LG&E receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

REQUESTS FOR INFORMATION

1) Please refer to the Attachment to the Response to Question No. 1(a) (b) of the First Request for Information of Association of Community Ministries (“ACM’s First Request”).

a) Please describe what types of assistance are included under the headings of “Emergency” and “Other”.

b) Please confirm that in the LG&E Residential Customers that Received Assistance from a Third Party column, a customer receiving third party assistance in more than one month is counted in each month in which the customer received assistance. If not confirmed, please explain.

c) Please provide a similar chart in Excel format showing the numbers of LG&E residential customers assisted for each month and category in place of the amounts of assistance.

2) Please refer to the Attachment to the Response to Question No. 2(a)(b) of ACM’s First Request:

a) Please confirm that the amounts provided are the annual amounts of third party assistance rather than the monthly amounts. If not confirmed, please provide the annual amounts by zip code in Excel format.

b) Please explain whether the numbers provided under the LG&E Residential Unique Customers that Received Assistance from a Third Party column are unduplicated numbers of customers so that, for example, a customer who received assistance in multiple months

during a year is counted only once in each year the assistance was received or whether the numbers of customers include duplicates so that, for example, a customer who received assistance twice during a year is counted twice in the listing provided.

- c) Please provide in Excel format a further breakdown of the numbers provided, showing the numbers of customers and amounts of third party assistance by the categories Ministry, Grant and Winterhelp (as shown in the Attachment to Response to Question No. 1). If the amounts shown on the Attachment to the Response to Question No. 2 are not annual, please use the annual amounts to be provided above in response to part (a) of this question.
- 3) Please refer to the Response to Question No. 4 of ACM's First Request.
- a) Please explain whether the numbers shown on Attachment (1) are unduplicated accounts so that for example, an account disconnected more than once during the period in question is shown only once or whether the numbers shown include duplicates so that, for example an account disconnected twice during the period in question is counted twice.
 - b) Are the numbers shown on Attachments (2) and (3) consistent with Attachment 1 regarding whether they are unduplicated or duplicated? If not please explain any differences.
- 4) Please refer to the Attachment to the Response to Question No. 6(a)(b) of ACM's First Request.
- a) Please explain what the numbers in the Average Number of Residential Customer Accounts Receiving 3rd Party Assistance column represent.
 - b) Please describe what information was used to calculate the numbers in the Average Number of Residential Customer Accounts Receiving 3rd Party Assistance column and provide the calculations in Excel Format.

- c) Please provide the actual numbers of Residential Customer Accounts Receiving 3rd Party Assistance responsible for generating each of the figures listed under the Residential Sales columns in Excel format.

Respectfully submitted,



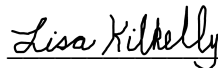
Lisa Kilkelly
Eileen L. Ordoover
LEGAL AID SOCIETY, INC.
416 W. Muhammad Ali Blvd., Ste. 300
Louisville, Kentucky 40202
Telephone: (502) 584-1254
Facsimile: (502) 584-8014
Email: LKilkelly@laslou.org
EOrdoover@laslou.org

Counsel for ACM

Dated: December 13, 2018

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s December 13, 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 December 13, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium is being mailed to the Commission via Express Mail on December 13, 2018.



Lisa Kilkelly