

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

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

Association of Community Ministries, Inc. (“ACM”), by counsel, hereby submits its First 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 provide in Excel format:
 - a) the number of LG&E residential customers that received assistance from a third party agency for each month from January 1, 2015 through October 31, 2018. Please state the monthly amount of such funds.
 - b) For each month provided in the Response to part (a) above, please provide in Excel format a breakdown of the amount of third party assistance received by LG&E residential customers by type of assistance as listed on the Web portal through which third party assistance providers make pledges.
 - c) If the monthly amounts of third party assistance provided in the responses to parts (a) and (b) above differ from each other, please explain the reasons for any differences as between the two responses.

2. Please provide in Excel format a breakdown by zip code of the number of residential customers in the LG&E territory who had at least one bill paid by a third party agency and the amount of assistance paid. Please provide this information for the following years:
 - a) 2017
 - b) 2018 (through October 31)

3. Please provide the following information pertaining to non-payment disconnection/reconnection reports filed with the Public Service Commission.

- a) Please provide copies of the non-payment disconnection/reconnection reports filed by LG&E with the Public Service Commission for the July 1, 2016 through June 30, 2017 period and the July 1, 2017 through June 30, 2018 period.
- b) Please confirm that numbers of terminations and reinstatements on the electric customers reports consist of terminations and reinstatements of residential electric only and combined gas and electric customers, and that the corresponding numbers on the gas customers reports consist of terminations and reinstatements of residential gas only customers. If not confirmed, please provide an explanation of what information is included on each.
- c) If LG&E has made any changes to the information provided or manner of reporting on the reports requested in part (a) above, as compared to reports for previous reporting periods, please describe the changes and explain the reasons for such changes.
- d) For each of the reports requested in part (a) above pertaining to electric customers, please break down the numbers of customers terminated and numbers of customers reinstated into electric only and combined gas and electric customers.

4. Please provide in Excel format a breakdown by zip code of (1) the number of residential accounts in the LG&E service territory disconnected for nonpayment, (2) the number of those accounts for which service was reinstated and (3) the number of those accounts listed in (2), which were reinstated (in full or in part) with third party assistance for each of the years 7/1/2016 through 6/30/2017 and 7/1/2017 through 6/30/2018. Please provide this information for:

- a) residential electric only customers

- b) residential combined electric and gas customers
- c) residential gas only customers

5. Please provide in Excel format the average annual usage for LG&E residential customers for each of the following years, 2017 and 2018 (through October 31, 2018). Please provide the supporting calculations for these figures and describe what information was used in the calculations. Please provide this information for:

- a) residential electric customers
- b) residential gas customers

6. Please provide in Excel format the average annual usage for LG&E residential customers for each of the following years, 2017 and 2018 (through October 31, 2018), who received assistance from a third party agency during the calendar year in question. Please provide the supporting calculations for these figures and describe what information was used in the calculations. Please provide this information for:

- a) residential electric customers
- b) residential gas customers

7. Please provide in Excel format the average annual usage for LG&E residential customers by zip code for each of the following years, 2017 and 2018 (through October 31, 2018). Please provide the supporting calculations and describe what information was used in the calculations. Please provide this information for:

- a) residential electric customers
- b) residential gas customers

8. Please provide the average LG&E residential gas bill for each month starting January 1, 2017 through October 31, 2018 generated by the average residential gas volume consumed broken down into its component parts (including Customer Charge, Distribution Cost Component, Gas Supply Cost Component, DSM and Gas Line Tracker). Please specify the applicable rate of each component for each month. Please provide the data in Excel format.

9 Please provide the average LG&E residential electric bill for each month starting January 1, 2017 through October 31, 2018 generated by the average residential electric usage broken down into its component parts (including Customer Charge, Energy Charge, FAC/OST, ECR and DSM). Please specify the applicable rate of each component for each month. Please provide the data in Excel format.

10. Please provide the projected average LG&E residential electric and gas bills, respectively, for each month of the forecast period that would be incurred by the average residential customer, broken down into the requested customer and energy charges and projected billing factors including FAC/OSS, ECR, DSM, GSC and gas line tracker charges. Please provide the supporting calculations.

11. Please provide the average monthly temperature in the LG&E service territory for each month beginning January 1, 2015 and ending October 31, 2018.

12. Please provide in Excel format the number of residential accounts in the LG&E territory by zip code for the periods 7/1/2016 through 6/30/2017 and 7/1/2017 through 6/30/2018 which were electric only, gas only and combined gas and electric. If not available for the requested time periods, please provide for June 30, 2017 and June 30, 2018.

Respectfully submitted,

Lisa Kilkelly

Lisa Kilkelly
Eileen L. Ordovery
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
EOrdovery@laslou.org

Counsel for ACM

Dated: November 13, 2018

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8, I hereby certify that Association of Community Ministries, Inc.'s November 13, 2018 electronic filing of the foregoing First 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 November 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 November 13, 2018.

Lisa Kilkelly

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