

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)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
SECOND REQUESTS FOR INFORMATION OF
ASSOCIATION OF COMMUNITY MINISTRIES
DATED DECEMBER 13, 2018

FILED: JANUARY 2, 2019

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 28th day of December 2018.


Notary Public

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

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Second Requests for Information of
Association of Community Ministries
Dated December 13, 2018**

Case No. 2018-00295

Question No. 1

Responding Witness: Elizabeth J. McFarland

- Q-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.
- A-1.
- a) Pledge amounts are assigned to pledge types on the Company’s Web Portal by each Agency entering a pledge. The Company is not aware of the criteria used by each Agency when assigning a pledge type.
 - b) Confirmed. See supplemental response to ACM 1-1(a)(b) dated December 21, 2018.
 - c) Customers that receive third party assistance from multiple agencies in a month are counted once under each agency from which the customer received third party assistance in that month. See attachment being provided in Excel format.

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

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Second Requests for Information of
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Case No. 2018-00295

Question No. 2

Responding Witness: Elizabeth J. McFarland

Q-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.

A-2.

- a) Confirmed, the amount of third party assistance is an annual amount.
- b) The numbers in the column labeled "LG&E Residential Unique Customers that Received Assistance from a Third Party" is a count of customers who received assistance in one month or multiple months during a year and counted only once in each year the assistance was received.
- c) Customers that receive third party assistance from Ministry, Grant, and Winter Help are counted once under each category in which the customer

received third party assistance. See attachment being provided in Excel format.

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

LOUISVILLE GAS AND ELECTRIC COMPANY

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Case No. 2018-00295

Question No. 3

Responding Witness: Elizabeth J. McFarland

- Q-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.
- A-3.
- a) The numbers provided in Attachment (1) are numbers of disconnections, not numbers of disconnected customers, i.e., a customer disconnected twice would count as two disconnections in the data provided.
 - b) Yes, the numbers shown in Attachments (2) and (3) are counted in the same manner as in Attachment (1).

LOUISVILLE GAS AND ELECTRIC COMPANY

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Question No. 4

Responding Witness: Elizabeth J. McFarland

Q-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.

A-4.

- a) The numbers in the "Average Number of Residential Customer Accounts Receiving 3rd Party Assistance" column represent the average number of customers billed for each period in the response to ACM 1-6(a)(b).
- b) The sum of residential customer accounts receiving third party assistance billed each month divided by the number of billing periods. See attachment being provided in Excel format.
- c) See attachment being provided in Excel format.

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