

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC INVESTIGATION OF HOME)	
ENERGY ASSISTANCE PROGRAMS OFFERED)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT)	2019-00366
TO KRS 278.285(4))	

ATTORNEY GENERAL'S COMBINED INITIAL DATA REQUESTS

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention (“Attorney General”), and submits these Initial Data Requests, with questions to the each of the specified investor-owned utilities identified by heading below, to be answered by January 3, 2020, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate requested item will be deemed a satisfactory response.
- (2) Identify the witness who will be prepared to answer questions concerning each request.
- (3) Repeat the question to which each response is intended to refer.
- (4) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (5) Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person’s knowledge, information, and belief formed after a reasonable inquiry.

(6) If you believe any request appears confusing, please request clarification directly from undersigned Counsel for the Office of Attorney General.

(7) 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.

(8) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

(9) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, notify the Office of the Attorney General as soon as possible, and in accordance with Commission direction.

(10) As used herein, the words “document” or “documents” are to be construed broadly and shall mean the original of the same (and all non-identical copies or drafts thereof) and if the original is not available, the best copy available. These terms shall include all information recorded in any written, graphic or other tangible form and shall include, without limiting the generality of the foregoing, all reports; memoranda; books or notebooks; written or recorded statements, interviews, affidavits and depositions; all letters or correspondence; telegrams, cables and telex messages; contracts, leases, insurance policies or other agreements; warnings and caution/hazard notices or labels; mechanical and electronic recordings and all information so stored, or transcripts of such recordings; calendars, appointment books, schedules, agendas and diary entries; notes or memoranda of conversations (telephonic or otherwise), meetings or conferences; legal pleadings and transcripts of legal proceedings; maps, models, charts, diagrams, graphs and other demonstrative materials; financial statements, annual reports, balance sheets and other accounting

records; quotations or offers; bulletins, newsletters, pamphlets, brochures and all other similar publications; summaries or compilations of data; deeds, titles, or other instruments of ownership; blueprints and specifications; manuals, guidelines, regulations, procedures, policies and instructional materials of any type; photographs or pictures, film, microfilm and microfiche; videotapes; articles; announcements and notices of any type; surveys, studies, evaluations, tests and all research and development (R&D) materials; newspaper clippings and press releases; time cards, employee schedules or rosters, and other payroll records; cancelled checks, invoices, bills and receipts; and writings of any kind and all other tangible things upon which any handwriting, typing, printing, drawings, representations, graphic matter, magnetic or electrical impulses, or other forms of communication are recorded or produced, including audio and video recordings, computer stored information (whether or not in printout form), computer-readable media or other electronically maintained or transmitted information regardless of the media or format in which they are stored, and all other rough drafts, revised drafts (including all handwritten notes or other marks on the same) and copies of documents as hereinbefore defined by whatever means made.

(11) 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 and legal basis for the privilege asserted.

(12) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

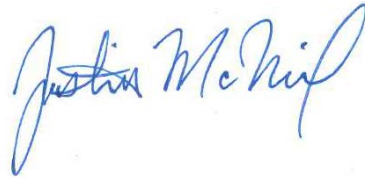
(13) Provide written responses, together with any and all exhibits pertaining thereto, in one or more bound volumes, separately indexed and tabbed by each response, in compliance with Kentucky Public Service Commission Regulations.

(14) “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.

(15) “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.

Respectfully submitted,

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Questions to Kentucky American Water Company (“KAW”).

1. In its Response to Staff 1-2, KAW refers to “an ever-growing service area”, and has acquired multiple water systems in recent years.
 - a. Explain whether it plans to increase the shareholder contribution for the H2O Help to Others Program in light of this expansion.
 - b. Explain the factors that go into determining the amount of shareholder contributions in any one year.
 - c. Refer to KAW Response to Staff 1-1. Explain why the shareholder contributions have remained relatively flat since 2014-2015, following a modest increase in 2017-2018, and decreased in the most recent program year.
2. Refer to KAW Response to Staff 1-4. KAW refers to its calculations in determining the Operating Fee as including “funds projected to be raised by other means (customer donations or fundraising efforts).”
 - a. Explain the meaning and extent of fundraising efforts, and whether this changes year to year.
3. Refer to KAW’s Response to Staff 1-1, wherein KAW disclosed, apparently for the first time, that in Case No. 2018-00358 it “inadvertently included \$11,764 in its proposed revenue requirement which is now embedded in current rates.”
 - a. Explain whether the errant inclusion of the \$11,764 in the Company’s proposed revenue requirement in Case No. 2018-00358 was specifically related to the Company’s HEA, or whether it was an unrelated oversight.
 - b. Identify where in KAW’s application in Case No. 2018-00358 this error occurred and where it can be identified.
 - c. State when KAW first became aware of this error, and by what means it became aware of it.
 - d. Explain how KAW proposes to return the \$11,764 to ratepayers.

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- e. Explain whether the Company incurred any additional costs or charges related to this oversight. If so, explain further whether the Company proposes to return those additional charges to ratepayers.
4. Refer to KAW's Response to Staff 1-7. Provide the number of available slots in the KAW HEA program for each of the past 5 years.
 - a. Explain how much of any increase in slots for each of the past 5 years is due to rolling unexpended funds from one program year to the next.
 - b. Explain whether KAW increased the number of slots in the HEA program for any reason other than having unexpended funds. If so, fully describe any such reason.
 5. Refer to KAW's Response to Staff 1-9. If neither KAW nor its administrator measure how applicants learned of the HEA program, explain how KAW ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how the Companies gauge the effectiveness of their communication efforts.

Questions to Louisville Gas and Electric Company and Kentucky Utilities Company ("LG&E-KU")

1. Refer to Staff's 2-1. If LG&E so confirms, explain why LG&E does not have a recurring benefits program, while KU does have one.
 - a. Explain also why KU does not have a crisis program.
 - b. In the event the Commission should require LG&E to implement a recurring benefits program, explain the financial impact, if any.
 - c. In the event the Commission should require KU to implement a crisis program, explain the financial impact, if any.
2. Refer to LG&E-KU's Response to Staff 1-3. If the APPRISE final report is publicly available, identify where on the Commission's website it can be located. If it is not on the Commission's website, provide a copy.

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3. Refer to LG&E-KU's Response to Staff 1-6. Explain why the average monthly benefit to LG&E program participants (\$66.40) is so much lower than the average monthly benefit to KU program participants (\$88.00).
4. Refer to LG&E-KU's Response to Staff 1-7. Provide the number of available slots in the LG&E-KU HEA program for each of the past 5 years.
 - a. Explain how much of any increase in slots for each of the past 5 years is due to rolling unexpended funds from one program year to the next.
 - b. Explain whether LG&E-KU increased the number of slots in the HEA program for any reason other than having unexpended funds. If so, fully describe any such reason.
5. Refer to LG&E-KU's Response to Staff 1-9. If neither LG&E-KU nor its administrator measure how applicants learned of the HEA program, explain how LG&E-KU ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how the Companies gauge the effectiveness of their communication efforts.

Questions to Kentucky Power Company ("KPCo")

1. Refer to KPCo's Response to Staff 1-7. Provide the number of available slots in the KPCo HEA program for each of the past 5 years.
 - a. Explain how much of any increase in slots for each of the past 5 years is due to rolling unexpended funds from one program year to the next.
 - b. Explain whether KPCo increased the number of slots in the HEA program for any reason other than having unexpended funds. If so, fully describe any such reason.
2. Refer to KPCo's Response to Staff 1-9. If neither KPCo nor its administrator measure how applicants learned of the HEA program, explain how KPCo ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how each it gauges the effectiveness of its communication efforts.

Questions to Duke Energy Kentucky, Inc. ("DEK")

1. Refer to Case 2018-00370, wherein DEK proposed to reduce the administrative cost charged by DEK's HEA administrator, Northern Kentucky Community Action Council ("NKCAC"), from the current 15% of program funds distributed to the lessor of actual costs to administer or 10% of the funds distributed, in accordance with a revised Memorandum of Understanding which DEK had reached with NKCAC. Confirm that the Commission denied DEK's proposal in order to pursue this change in the instant docket.
 - a. State whether DEK continues to agree that its Memorandum of Understanding with NKCAC should be reduced from the current 15% of program funds distributed, to the lessor of actual costs to administer or 10% of the funds distributed, as DEK had originally proposed.
2. Refer to DEK's Response to Staff 1-7. Confirm that any over/under collection of DEK's HEA charge is trued up as part of the Company's annual DSM rider true-up calculation, and that no unexpended funds are used to rollover to the next program year or to create new HEA program slots.
 - a. If confirmed, fully explain why DEK does not rollover unexpended funds to create more slots in the next program year.
 - b. Provide the number of available slots in the DEK HEA program for each of the past 5 years.
3. Refer to DEK's Response to Staff 1-8. Explain how DEK call center representatives determine which customers to refer to the HEA agency.
 - a. Explain whether information on the program is only provided to certain customers. If so, explain the factors that go into which customers are selected.
4. Refer to DEK's Response to Staff 1-9. If neither DEK nor its administrator measure how applicants learned of the HEA program, explain how DEK ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how it gauges the effectiveness of its communication efforts.

Questions to Columbia Gas of Kentucky, Inc. ("CGK").

1. Refer to Staff 2-1. Explain why Columbia does not also maintain a crisis program in addition to a recurring benefits program.
2. Refer to CGK's Response to Staff 1-7. Provide the number of available slots in the CGK HEA program for each of the past 5 years.
 - a. Explain how much of any increase in slots for each of the past 5 years is due to rolling unexpended funds/credits from one program year to the next.
 - b. Explain whether CGK increased the number of slots in the HEA program for any reason other than having unexpended funds. If so, fully describe any such reason.
3. Refer to CGK's Response to Staff 1-9. If neither CGK nor its administrator measure how applicants learned of the HEA program, explain how CGK ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how it gauges the effectiveness of its communication efforts.

Questions to Delta Natural Gas Company, Inc. ("Delta").

1. Refer to Delta's Response to Staff 1-7. Provide the number of available slots in the Delta HEA program for each of the past 5 years.
 - a. Explain how much of any increase in slots for each of the past 5 years is due to rolling unexpended funds from one program year to the next.
 - b. Explain whether Delta increased the number of slots in the HEA program for any reason other than having unexpended funds. If so, fully describe any such reason.
2. Refer to Staff 2-1. Explain why Delta does not also maintain a crisis program in addition to a recurring benefits program.
3. Refer to Delta's Response to Staff 1-8. Delta states that representatives and personnel "who work with residential customer billings educate individual customers about the HEA program when a customer appears to require assistance."

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- a. Fully explain how Delta personnel determine whether a customer requires assistance, and what factors go into any such determination.
- b. Refer further to Delta's Response to Staff 1-9. If neither Delta nor its administrator measure how applicants learned of the HEA program, explain how Delta ensures that customers who may qualify for the HEA program have been sufficiently engaged and educated on the available benefits, and how it gauges the effectiveness of its communication efforts.