

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

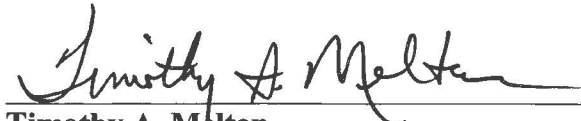
RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND
KENTUCKY UTILITIES COMPANY
TO ATTORNEY GENERAL'S INITIAL REQUEST FOR INFORMATION
DATED DECEMBER 17, 2019

FILED: JANUARY 3, 2020

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Timothy A. Melton**, being duly sworn, deposes and says that he is Manager – Customer Commitment for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Timothy A. Melton

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of January 2020.


Judy Schooler (SEAL)
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 and Kentucky Utilities Company
Response to Attorney General's Initial Request for Information
Dated December 17, 2019**

Case No. 2019-00366

Question No. 1

Witness: Eileen L. Saunders / Timothy A. Melton

- Q-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.
- A-1. Refer to LG&E/KU's responses to PSC 2-1 and 2-2. Questions 1a, 1b, and 1c are not applicable.

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Question No. 2

Witness: Eileen L. Saunders / Timothy A. Melton

- Q-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.
- A-2. The report is publicly available on the Commission's website at:
https://psc.ky.gov/pscscf/post%20case%20referenced%20correspondence/2007%20cases/2007-00337/20150313_lg&e%20and%20ku%20hea%20report.pdf

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Question No. 3

Witness: Eileen L. Saunders / Timothy A. Melton

- Q-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).
- A-3. LG&E provides a varied monthly amount year around based on participant's needs while KU provides a fixed monthly amount during its seven program months.

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Question No. 4

Witness: Eileen L. Saunders / Timothy A. Melton

- Q-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.

A-4.

- a. LG&E does not have a fixed number of slots. The number of slots available varies based on the financial need of the participants. LG&E's program offers slots with yearly benefits ranging from \$400 to \$1,000 in \$200 increments.

The number of available slots at KU is based on total available funds with a fixed monthly benefit. KU increased the number of slots in 2015 from 2,600 to 2,700 due to unexpended funds. KU temporarily increased the number of slots in 2019 from 2,700 to 3,500 due to unexpended funds. KU and CAC will monitor the temporary slot increase and adjust accordingly.

- b. LG&E and KU have not increased the number of slots for any reason other than unexpended funds.

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Question No. 5

Witness: Eileen L. Saunders / Timothy A. Melton

- Q-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.
- A-5. The Companies actively engage with both program administrators regarding communication efforts. For example, in an effort to fill all available HEA slots, LG&E is partnering with AEC to increase program awareness through co-branding AEC's marketing materials and by increasing HEA-related Company communications. For KU, the past existence of a participant wait list indicates effective HEA program communications.