

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

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

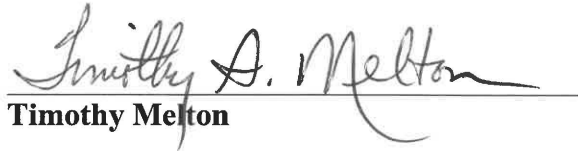
**RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**AND**  
**KENTUCKY UTILITIES COMPANY**  
**TO COMMISSION STAFF'S POST-FORMAL**  
**CONFERENCE REQUEST FOR INFORMATION TO PARTIES**  
**DATED FEBRUARY 26, 2020**

**FILED: MARCH 6, 2020**

**VERIFICATION**

**COMMONWEALTH OF KENTUCKY )**  
**)**  
**COUNTY OF JEFFERSON )**

The undersigned, **Timothy 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 Melton**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 6th day of March 2020.

 (SEAL)  
Notary Public

Notary Public, ID No. 603967

My Commission Expires:

7/11/2022

**VERIFICATION**

**COMMONWEALTH OF KENTUCKY )**  
**) )**  
**COUNTY OF JEFFERSON  )**

The undersigned, **Eileen L. Saunders**, 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.

  
\_\_\_\_\_  
**Eileen L. Saunders**

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14<sup>th</sup> day of March 2020.

 (SEAL)  
\_\_\_\_\_  
Notary Public

Notary Public, ID No. 603967

My Commission Expires:  
  
7/11/2022

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff's Post-Formal Conference Request  
for Information to Parties  
Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 1**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-1. Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, shall provide the following information for January 1, 2015, until December 31, 2019. If a utility has both electric and gas residential customers, provide the information requested for electric residential customers, gas residential customers, and the total number of residential customers.
- a. Total number of residential customers for each year.
  - b. Monthly and annual totals of service termination notices issued to residential customers only for non-payment of bills.
  - c. Monthly and annual totals of service termination for residential customers only for non-payment of bills.
  - d. Monthly and annual total amount of unique residential customers issued service termination notices for non-payment of bills.
  - e. Monthly and annual total amount of unique residential customers with service terminated for non-payment of bills.
- A-1. See attachments provided in Excel format.

The attachments are  
being provided in  
separate files in Excel  
format.

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff's Post-Formal Conference  
Request for Information To Parties  
Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 2**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-2. For each month from January 1, 2015, to December 31, 2019, Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should provide the total number of LIHEAP recipients, HEA recipients and customers who received both LIHEAP and HEA benefits.
- A-2. See attached provided in Excel format.

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

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff's Post-Formal Conference Request  
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Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 3**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-3. For each month from January 1, 2015, to December 31, 2019, Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should provide the monthly total average residential bill that includes the cost of current service and arrearages. For utilities that provide gas and electric service, break out the amounts by gas-only, electric-only, and combined gas and electric customers.
- A-3. The total monthly amount billed for a customer was used to calculate the averages. If a residential customer's account includes a GS service for a detached garage and/or an outdoor light, the charges for the GS service and/or outdoor light will be included in the total amount billed. The total amount billed is either the budget amount, if the customer participates in the Company's budget payment plan, or the sum of many items including current charges, arrearages, overpayments, late payment charges, and installment plan agreement. See attached provided in Excel format.



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

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff’s Post-Formal Conference Requests  
for Information to Parties  
Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 4**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-4. Columbia Kentucky, Delta, Duke Kentucky, LG&E, KU, and Kentucky Power, respectively, should explain how its process currently in place for disconnection of residential service for non-payment complies with the applicable sections of 807 KAR 5:006, Sections 14 and 15. Provide sample bills or inserts that evidence compliance with those applicable sections.
- A-4. The Companies’ process currently in place for disconnection of residential service for non-payment complies with the applicable sections of 807 KAR 5:006, Sections 14 and 15.

Any numeric references in bold parentheses made in the “Companies’ Compliance” column in the table below refer to notes found in attachment 1.

<b>Applicable 807 KAR 5:006 Section</b>	<b>Companies’ Compliance</b>
<p><b>Section 14(5) Advance termination notice.</b> If advance termination notice is required, the termination notice shall be mailed or otherwise delivered to the customer’s last known address. The termination notice shall be in writing, distinguishable and separate from a bill.</p> <p>(a) The termination notice shall plainly state the reason for termination, that the termination date shall not be affected by receipt of a subsequent bill, and that the customer has the right to dispute the reasons for termination.</p>	<p>Companies’ disconnection notices are sent to the last known mailing address for the customer.</p> <p>The disconnection notice sections normally colored red (KU) or green (LG&amp;E) on a bill are instead colored brown <b>(1)</b>.</p> <p>The notices plainly state:</p> <ul style="list-style-type: none"> <li>- the reason for disconnection <b>(2)</b> and;</li> <li>- that the termination date will not be affected by receipt of a subsequent bill <b>(3)</b>.</li> </ul> <p>The notices provide a number for the customer to call if they disagree with the reason that service was terminated <b>(4)</b>.</p>

Applicable Section	Companies' Compliance
<p><b>Section 15(1)(f) For nonpayment of bills.</b> A utility may terminate service at a point of delivery for nonpayment of charges incurred for utility service at that point of delivery. A utility shall not terminate service to any person contracting for service for nonpayment of bills for any tariffed charge without first having mailed or otherwise delivered an advance termination notice which complies with the requirements of Section 14(5) of this administrative regulation.</p>	<p>Please see the response to Section 14(5).</p>
<p><b>Section 15(1)(f)1.a.</b> Each electric or gas utility proposing to terminate customer service for nonpayment shall mail or otherwise deliver to that customer ten (10) days' written notice of intent to terminate.</p>	<p>The Companies give at least 10 days' written notice of intent to terminate. Please refer to (5) and attachment 2.</p>
<p><b>Section 15(1)(f)1.b.</b> Service shall not, for any reason, be terminated before twenty-seven (27) days after the mailing date of the original unpaid bill.</p>	<p>The Companies do not terminate service before twenty-seven (27) days after the mailing date of the original unpaid bill. Please refer to attachment 2.</p>
<p><b>Section 15(1)(f)1.c.</b> The termination notice to residential customers shall include written notification to the customer of the existence of local, state, and federal programs providing for the payment of utility bills under certain conditions, and of the address and telephone number of the Cabinet for Health and Family Services (or its designee) to contact for possible assistance.</p>	<p>The Companies disconnection notices make customers aware of local, state, and federal programs providing for the payment of utility bills under certain conditions (6). The Companies also provide the address and telephone number of the Cabinet for Health and Family Services (or its designee) to contact for possible assistance (7).</p>



Mailed 3/2/20 for Account #

(1) - Different Color from Bills

DELINQUENT AMOUNT DUE  
\$652.58

FINAL PAY DATE  
3/12/20

Account Name:  
Service Address:

(5) - At Least 10 Days' Written Notice

Online Payments: lge-ku.com  
Telephone Payments: (800) 981-0600, press 1-2-3  
24 hours a day; \$2.00 fee  
Customer Service: (800) 981-0600  
M-F, 7am-7pm ET  
Walk-in Center: 2201 Cumberland Avenue  
Middlesboro, KY 40965  
M-F, 9am-5pm ET

(2) - Reason for Disconnection



### DISCONNECTION NOTICE

Your account is past due. If the **Delinquent Amount Due** is not received by the **Final Pay Date**, your service will be subject to disconnection.

**Reconnection:** Your service will be reconnected within 24 hours after verification of full payment of the Delinquent Amount Due. A reconnect fee and a new or additional deposit will be required as a condition of reconnection.

**Unauthorized reconnection of service is punishable by law.**



### CUSTOMER ASSISTANCE

If you are unable to pay the total delinquent amount by the final pay date, call our Customer Service department. You may also contact the Commonwealth of Kentucky's Cabinet for Families and Children at 800-372-2973 for information about the availability of local, state or federal programs for assistance.

If you need financial assistance during the heating season, please contact one of the **Community Assistance Agencies** near you, listed on the back of this notice.

(6) - Awareness of Available Assistance

### \$ PAYMENT OPTIONS

Full payment of the delinquent amount due can be made:

- Call **800-981-0600** and press **1-2-3**. Payment can be made 24 hours a day with credit card, debit card or electronic check (\$2.00 fee for phone payments).
- Visit **lge-ku.com**. Payment can be made 24 hours a day with electronic check (no fee), credit card or debit card (\$2.00 fee).
- **Authorized Payment Agent locations:** Please present this bill at the time of payment. Please visit [lge-ku.com/locations](http://lge-ku.com/locations) to find an authorized payment agent location near you. If services are disconnected, please call **800-981-0600** once payment is made to have services restored.
- KU Customer Service Walk-in Center.

(3) - Effects of Future Bills

**The Final Pay Date will not change upon receipt of future bills.** If your service is disconnected and you disagree with the reason of termination, call us at **800-981-0600**.

(4) - Dispute Reasons for Termination

Delinquent Amount Due 3/12/20 \$652.58

**Total Amount Enclosed:**

Account #  
Service Address:

Mailing Address



a PPL company  
PO Box 25212  
Lehigh Valley, PA 18002-5212



**(7) - Contact  
Information for  
Assistance**



**CUSTOMER ASSISTANCE** (Continued)

**Knox County**

**K.C.E.O.C CAA**

5448 N. US 25E Suite A

Gray, KY 40734

(606) 546-3152

[www.kceoc.com](http://www.kceoc.com)



**(1) - Different Color from Bills**

Mailed **2/3/20** for Account #

DELINQUENT AMOUNT DUE  
**\$215.42**

FINAL PAY DATE  
**2/13/20**

Account Name:  
 Service Address:

**(5) - At Least 10 Days' Written Notice**

**(2) - Reason for Disconnection**



**DISCONNECTION NOTICE**

Your account is past due. If the **Delinquent Amount Due** is not received by the **Final Pay Date**, your service will be subject to disconnection.

**Online Payments:** lge-ku.com  
**Telephone Payments:** (502) 589-1444, press 1-2-3  
 24 hours a day; \$2.00 fee  
**Customer Service:** (502) 589-1444  
 M-F, 7am-7pm ET  
**Walk-in Center:** 820 W. Broadway Louisville, KY 40202  
 M-F, 8am-5pm ET

**Reconnection:** Your service will be reconnected within 24 hours after verification of full payment of the Delinquent Amount Due. A reconnect fee and a new or additional deposit will be required as a condition of reconnection.

**Unauthorized reconnection of service is punishable by law.**



**CUSTOMER ASSISTANCE**

If you are unable to pay the total delinquent amount by the final pay date, call our Customer Service department. You may also contact the Commonwealth of Kentucky's Cabinet for Families and Children at 800-372-2973 for information about the availability of local, state or federal programs for assistance.

If you need financial assistance during the heating season, please contact one of the **Community Assistance Agencies** near you, listed on the back of this notice.

**(6) - Awareness of Available Assistance**

**\$ PAYMENT OPTIONS**

Full payment of the delinquent amount due can be made:

- Call **502-589-1444** and press **1-2-3**. Payment can be made 24 hours a day with credit card, debit card or electronic check (\$2.00 fee for phone payments).
- Visit **lge-ku.com**. Payment can be made 24 hours a day with electronic check (no fee), credit card or debit card (\$2.00 fee).
- **Authorized Payment Agent locations:** Please present this bill at the time of payment. Please visit [lge-ku.com/locations](http://lge-ku.com/locations) to find an authorized payment agent location near you. If services are disconnected, please call **502-589-1444** once payment is made to have services restored.
- LG&E Customer Service Walk-in Center.

**(3) - Effects of Future Bills**

**The Final Pay Date will not change upon receipt of future bills.** If your service is disconnected and you disagree with the reason of termination, call us at **502-589-1444**.

**(4) - Dispute Reasons for Termination**

Delinquent Amount Due **2/13/20** **\$215.42**  
**Total Amount Enclosed:**

Account #  
 Service Address

Mailing Address5



PO Box 25211  
 Lehigh Valley, PA 18002-5211





## CUSTOMER ASSISTANCE (Continued)

### **West Louisville Community Ministries**

3146 W. Broadway  
Louisville, KY 40211  
(502) 409-7371

### **Sister Visitors Center**

2235 West Market Street  
Louisville, KY 40212  
(502) 776-0155

### **Central Jefferson County**

#### **Office of Resilience and Community Services**

LiHEAP Season 502-991-8391    Off Season (502) 574-1157

### **East Jefferson County**

#### **Office of Resilience and Community Services**

4810 Exeter Ave.  
Louisville, KY 40218  
(502) 574-1270

### **South Jefferson County**

#### **Office of Resilience and Community Services**

7219 Dixie Hwy.  
Louisville, KY 40258  
(502) 574-1272

**(7) - Contact  
Information for  
Assistance**



Invoice and Dunning Calendar

# Invoice and Dunning Calendar

Day	Calendar # of Days	Timeline
		Document Date (Account History) *16 Business Days = 22 Calendar days for Invoice Due Date
Wednesday	1	Day 1
Thursday	2	Day 2
Friday	3	Day 3
Saturday	4	
Sunday	5	
Monday	6	Day 4
Tuesday	7	Day 5
Wednesday	8	Day 6
Thursday	9	Day 7
Friday	10	Day 8
Saturday	11	
Sunday	12	
Monday	13	Day 9
Tuesday	14	Day 10
Wednesday	15	Day 11

**This is the day the invoice (bill) is sent to the customer**



Day	Calendar # of Days	Timeline
		Document Date (Account History) *16 Business Days = 22 Calendar days for Invoice Due Date
Thursday	16	Day 12
Friday	17	Day 13
Saturday	18	
Sunday	19	
Monday	20	Day 14
Tuesday	21	Day 15
Wednesday	22	Day 16 Invoice Due Date = 22 Calendar Days
Thursday	23	Day 1 LPC Posts
Friday	24	Day 2 Disc Notice Mailed + 8 Business Days = Disc Notice Due Date
Saturday	25	
Sunday	26	
Monday	27	Day 1
Tuesday	28	Day 2
Wednesday	29	Day 3
Thursday	30	Day 4
Friday	31	Day 5
Saturday	32	
Sunday	33	

**This is the day the invoice (bill) is due**

**Late Payment Charge (LPC)**

**Disconnection Notice Mailed to Customer**

Invoice and Dunning Calendar

Day	Calendar # of Days	Timeline
		Document Date (Account History) *16 Business Days = 22 Calendar days for Invoice Due Date
Monday	34	Day 6
Tuesday	35	Day 7
Wednesday	36	Day 8 Disc Notice Due Date

**Disconnection Notice Due at 36th Calendar Day after the last invoice (bill) was mailed**

**Disconnection Notice Due Date is 12 Calendar Days after it is Mailed**

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff's Post-Formal Data Request  
for Information to Parties  
Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 5**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-5. Confirm that a customer can only receive Wintercare if they have received a disconnect notice from the utility.
- A-5. CAC confirmed that customers may have a disconnect notice, but it is not required to receive WinterCare utility bill assistance. WinterCare offers a maximum benefit to eligible households of \$300 per assistance period (October 1-May 31) which may be used for current service, deposits and reconnection fees.

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff's Post-Formal Data Request  
for Information to Parties  
Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 14**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-14. The purpose of the Affordable Energy Corporation (AEC) is to increase the affordability of a customer's utilities. Explain whether the affordability measure, or the percent of utility bill for income, has ever been readjusted. If so, explain the amount of and the reasons for the readjustment.
- A-14. Yes, the affordability measure was adjusted in 2016. AEC confirmed their Board of Directors made the decision to adjust the Utility Affordability percentiles due to increased cost of living and utility costs.

The Percent of Affordability changed as follows for all household sizes:

Household Size	2007	2016
1	12%	10%
2	10%	8%
3	9%	7%
4	8%	6%
5	7.5%	5.5%
6	7%	5%
7	6.5%	4.5%
8	6%	4%
9	5.5%	3.5%
10+	5%	3%

In 2007, the benefit levels were set at \$200, \$400, \$700 or \$1,000. In 2016, the AEC Board of Directors made the decision to adjust the benefit tier levels to \$400, \$600, \$800, or \$1,000 to address the amount needed for household stability.

**Louisville Gas and Electric Company and Kentucky Utilities Company  
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**Case No. 2019-00366**

**Question No. 15**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-15. Provide the following information by month for each month between January 1, 2015, and December 31, 2019.
- a. The average monthly residential bill for electric-only customers.
  - b. The average monthly residential bill for gas-only customers.
  - c. The average monthly residential bill for combined gas and electric customers.
- A-15. LG&E information is provided in attached Excel document. The current monthly amount billed for a customer was used to calculate the averages. The current amount billed includes all charges for customers on:
- Electric Tariff Sheet No. 5 Residential Service
  - Electric Tariff Sheet No. 6 Residential Time-of-Day Energy Service,
  - Electric Tariff Sheet No. 7 Residential Time-of-Day Demand Service
  - Gas Tariff Sheet No. 5 Residential Gas Service.

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

**Louisville Gas and Electric Company and Kentucky Utilities Company  
Response to Commission Staff's Post-Formal Data Request  
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Dated February 26, 2020**

**Case No. 2019-00366**

**Question No. 16**

**Witness: Eileen L. Saunders / Timothy A. Melton**

Q-16. Refer to LG&E's response to Commission Staff's Third Request for Information, Item 10. Provide the averages requested in subparts b and c broken out by residential gas-only, electric-only and combined gas and electric.

A-16. LG&E information is provided in attached Excel document.

The current monthly amount billed for a customer was used to calculate the averages. The current amount billed includes all charges for customers on:

- Electric Tariff Sheet No. 5 Residential Service
- Electric Tariff Sheet No. 6 Residential Time-of-Day Energy Service
- Electric Tariff Sheet No. 7 Residential Time-of-Day Demand Service
- Gas Tariff Sheet No. 5 Residential Gas Service.

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



**Louisville Gas and Electric Company and Kentucky Utilities Company  
 Response to Commission Staff's Post-Formal Data Request  
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**Case No. 2019-00366**

**Question No. 17**

**Witness: Eileen L. Saunders / Timothy A. Melton**

Q-17. Provide the average administration fee paid to Wintercare and the percent of this payment as compared to total funds distributed to Wintercare for the last three years.

A-17. The information provided is for LG&E's Community Winterhelp program.

<u>Year</u>	<u>Customer Donations</u>	<u>Utility Donation / Contribution</u>	<u>Total Amount Collected</u>	<u>Customer Benefits</u>	<u>Admin Costs</u>	<u>Admin Costs (% of funds Collected)</u>	<u>Admin Costs (% of funds Disbursed)</u>
2017	\$118,373	\$118,373	\$236,746	\$224,470	\$11,850	5.0%	5.3%
2018	\$120,269	\$150,750	\$271,019	\$243,738	\$11,850	4.4%	4.9%
2019	\$111,832	\$111,832	\$223,664	\$234,612	\$11,850	5.3%	5.1%

**Louisville Gas and Electric Company and Kentucky Utilities Company  
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**Case No. 2019-00366**

**Question No. 18**

**Witness: Eileen L. Saunders / Timothy A. Melton**

- Q-18. State whether legal fees incurred by Community Action Council of Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties, Inc., as a result of intervening in KU's rate cases since 2014, were included in HEA administrative fees charged to and paid by KU.
- A-18. CAC confirmed it has never used any funds from KU to pay legal fees to intervene in KU rate cases.