

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
FOR AN ADJUSTMENT OF ITS ELECTRIC)	
AND GAS RATES, A CERTIFICATE OF)	
PUBLIC CONVENIENCE AND NECESSITY TO)	CASE NO. 2020-00350
DEPLOY ADVANCED METERING)	
INFRASTRUCTURE, APPROVAL OF CERTAIN)	
REGULATORY AND ACCOUNTING)	
TREATMENTS, AND ESTABLISHMENT OF A)	
ONE-YEAR SURCREDIT)	

**MARCH 2, 2021 SUPPLEMENTAL RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
METROPOLITAN HOUSING COALITION,
KENTUCKIANS FOR THE COMMONWEALTH, AND
KENTUCKY SOLAR ENERGY SOCIETY'S
SECOND SET OF DATA REQUESTS
DATED FEBRUARY 5, 2021**

FILED: MARCH 2, 2021

LOUISVILLE GAS AND ELECTRIC COMPANY

**March 2, 2021 Supplemental Response to Metropolitan Housing Coalition,
Kentuckians for the Commonwealth, and Kentucky Solar Energy Society's
Second Set of Data Requests
Dated February 5, 2021**

Case No. 2020-00350

Question No. 1

Responding Witness: Daniel K. Arbough / Eileen L. Saunders

Q-1.

- a. Please provide 2019, 2020 and YTD data for the number of people who are eligible for electric and/or gas disconnection by address and census tract.
- b. Please provide 2019, 2020 and YTD data on the number of people who are late in their electric and/or gas payments by address and census tract.
- c. Please provide 2019, 2020 and YTD data on the average amount owed on past due bills by address and census tract.
- d. Please provide 2019, 2020 and YTD data on the number of people who have a signed repayment plan by address and census tract.
- e. Please provide current data on the number of people who are late in their payments, but do not have a signed payment plan in place by address and census tract.
- f. Please provide current data on the number of people who have a signed payment plan who are current on that payment plan by address and census tract.
- g. Please provide current data on the number of people who have a signed payment plan who have missed one or more payments by address and census tract.
- h. Are the people who have missed one or more payments on their payment plan included in the overall number of people who are currently eligible for disconnection?
- i. Please provide information and data regarding the mean and median number of months customers are behind on payments both in the aggregate and by census tract.

- j. Please provide information and data regarding the number of accounts and the average bill amount due for those that are 2 months behind on payments, 3 months behind on payments, 6 months behind on payments, and 9 months behind on payments.
- k. Please describe your practices for when someone falls behind on a payment plan. If they miss one payment, are they immediately eligible for disconnection?
- l. Please provide data on the number of electric and gas meters by census tract.
- m. Please provide data on costs associated with damages and repairs to infrastructure by census tract.
- n. What amount of funds that you are seeking in this case are allocated toward capital expenditures related to electric service, and to gas service?

A-1. **Original Response:**

The Company does not maintain census tract data in its records. Customer address is considered private customer information. For these reasons census tract and address cannot be provided. Additionally, the Company does not maintain records or information in the manner requested for many sub-parts below. The following represents the Company’s best effort to be responsive to the requests.

- a. See attached.
- b. Number of residential customers late in their payments (past due customers).

Year	Customers Late in Their Payments (Past Due Customers)
2019	764,022
2020	760,017

- c. Average residential amount owed on past due bills.

Year	Average Residential Amounts Owed
2019	\$144.08
2020	\$165.19

- d. Number of residential signed payment plans. Signed payment plans includes all payment plans that are 30 days or more.

Year	Signed Payment Plans
2019	3,748
2020	35,428
January 2021	2,693

- e. For the 30 days ending February 8, 2021, there were 59,319 unique residential customers who were late on their payments, but not on a signed payment plan. This number includes 3,755 customers who are on shorter term payment plans and those that have paid their past due amounts after their bill due date past. Customers late on their payments does not include customers who were previously set up on a signed payment plan and have maintained payments.
- f. There are 13,524 residential customers on signed payment plans as of February 9, 2021.
- g. Typically, when customer misses one payment, the plan is removed and the entire balance is due.
- h. Yes. When a customer falls behind on a payment plan, the payment plan is removed and the customer is provided the opportunity to pay the full amount. A disconnection notice providing 10 additional business days to pay or contact the Company is sent to the customer prior to disconnection.

- i. Mean and median number of months for past due residential customers.

Year	Mean	Median
2019	2	2
2020	3	2

- j. Number of residential accounts and amounts for specific number of months past due.

Year	2 Months	Average Amount	3 Months	Average Amount	6 Months	Average Amount	9 Months	Average Amount
2019	35,413	\$118	9,427	\$203	426	\$544	64	\$829
2020	28,702	\$128	11,380	\$242	1,868	\$612	579	\$938

- k. See response to h above.
- l. The number of residential meters at February 6, 2021, are 377,632 electric and 302,517 gas.
- m. The Company does not track costs associated with damages and repairs to infrastructure by census tract.
- n. The drivers of the rate case are discussed at pages 20-23 of Mr. Blake’s testimony, which include investments in the facilities to provide safe, reliable service to customers.

March 2, 2021 Supplemental Response:

- a. The utility residential moratorium began on March 16, 2020. The eligible residential disconnection data by zip code is shown in the attachment being provided in Excel format. The data will not agree in total to the original response on MHC 2-1(a) due to the differences over time. These differences are due to billing adjustments, move orders, etc. Any action that changes the history of the account can affect this data.

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