

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

**In the Matter of:**

<b>ELECTRONIC 2024 JOINT INTEGRATED</b>	<b>)</b>	
<b>RESOURCE PLAN OF LOUISVILLE GAS AND</b>	<b>)</b>	<b>CASE NO. 2024-00326</b>
<b>ELECTRIC COMPANY AND KENTUCKY</b>	<b>)</b>	
<b>UTILITIES COMPANY</b>	<b>)</b>	

**MAY 8, 2025 SUPPLEMENTAL AND CORRECTED RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**AND**  
**KENTUCKY UTILITIES COMPANY**  
**TO**  
**JOINT INTERVENORS METROPOLITAN HOUSING COALITION,**  
**KENTUCKIANS FOR THE COMMONWEALTH, KENTUCKY SOLAR**  
**ENERGY SOCIETY AND MOUNTAIN ASSOCIATION'S, INITIAL**  
**REQUEST FOR INFORMATION**  
**DATED NOVEMBER 22, 2024**

**FILED: MAY 8, 2025**

**LOUISVILLE GAS AND ELECTRIC COMPANY  
AND  
KENTUCKY UTILITIES COMPANY**

**May 8, 2025 Supplemental and Corrected Response to Joint Intervenor  
Metropolitan Housing Coalition, Kentuckians for the Commonwealth, Kentucky  
Solar Energy Society and Mountain Association's Initial Request for Information  
Dated November 22, 2024**

**Case No. 2024-00326**

**Question No. 1.55**

**Responding Witness: Shannon L. Montgomery / Stuart A. Wilson**

Q-1.55. Please provide the following data over the most recent three-year period available, and related internal analysis considered as part of the 2024 IRP:

- a. Monthly number of customers that received a disconnection notice by zip code;
- b. Monthly number of disconnections for nonpayment by zip code;
- c. Monthly average number of customers with a past due balance;
- d. Monthly average past due balance amount;
- e. Monthly average number of participants in a payment assistance program

A-1.55. **Original Response:**

c. and d. See the table below.

	<u>2021</u>	<u>2022</u>	<u>2023</u>
c. Monthly average number of customers with a past due balance	99,335	103,142	103,199
d. Monthly average past due balance amount	\$ 199.46	\$ 202.72	\$ 188.12

**February 14, 2025 Corrected Response:**

Following the submission of this initial request for information, the Companies identified that the averaging function in SQL did not perform as expected to return the average number of customer with a past due balance or the monthly average past due balance amounts. The corrections are provided in the table below.

	<u>2021</u>	<u>2022</u>	<u>2023</u>
c. Monthly average number of customers with a past due balance	109,160	130,102	149,243
d. Monthly average past due balance amount	\$ 221.52	\$ 219.64	\$ 194.27

**May 8, 2025 Supplemental and Corrected Response:**

Following the submission of this initial supplemental and corrected request for information, the Companies identified that SQL was not including accounts that are now closed in the average number of customers with a past due balance or the monthly average past due balance amounts. The corrections are provided in the table below.

	<u>2021</u>	<u>2022</u>	<u>2023</u>
c. Monthly average number of customers with a past due balance	202,814	210,473	210,930
d. Monthly average past due balance amount	\$ 200.53	\$ 202.95	\$ 187.97

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<b>ELECTRONIC 2024 JOINT INTEGRATED</b>	<b>)</b>	
<b>RESOURCE PLAN OF LOUISVILLE GAS AND</b>	<b>)</b>	<b>CASE NO. 2024-00326</b>
<b>ELECTRIC COMPANY AND KENTUCKY</b>	<b>)</b>	
<b>UTILITIES COMPANY</b>	<b>)</b>	

**MAY 8, 2025 SUPPLEMENTAL AND CORRECTED RESPONSE OF**  
**LOUISVILLE GAS AND ELECTRIC COMPANY**  
**AND**  
**KENTUCKY UTILITIES COMPANY**  
**TO**  
**THE MOUNTAIN ASSOCIATION, KENTUCKIANS FOR THE**  
**COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY AND**  
**METROPOLITAN HOUSING COALITION’S SUPPLEMENTAL**  
**REQUESTS FOR INFORMATION**  
**DATED JANUARY 22, 2024**

**FILED: MAY 8, 2025**

**LOUISVILLE GAS AND ELECTRIC COMPANY  
AND  
KENTUCKY UTILITIES COMPANY**

**May 8, 2025 Supplemental and Corrected Response to Mountain Association,  
Kentuckians for the Commonwealth, Kentucky Solar Energy Society and  
Metropolitan Housing Coalition's Supplemental Requests for Information  
Dated January 22, 2024**

**Case No. 2024-00326**

**Question No. 2.36**

**Responding Witness: Shannon L. Montgomery**

Q. 2.36. Please refer to the Companies' response to JI 1.55, and provide:

- a. Monthly average number of customers with a past due balance by zip code or census tract.
- b. Monthly average past due balance amount by zip code or census tract.

A. 2.36. **Original Response:**

The Companies object to this request as irrelevant. Without waiving this objection, see the attachment being provided in a separate file.

**May 8, 2025 Supplemental and Corrected Response:**

Following the submission of this initial request for information, the Companies identified that SQL was not including accounts that are now closed in the average number of customers with a past due balance or the monthly average past due balance amounts. See the attachment being provided in a separate file.


**VERIFICATION**

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

The undersigned, **Shannon L. Montgomery**, being duly sworn, deposes and says she is the Vice President, Customer Services for Kentucky Utilities Company and Louisville Gas and Electric 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.

  
\_\_\_\_\_  
Shannon L. Montgomery

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 7th day of May 2025.

  
\_\_\_\_\_  
Notary Public

Notary Public ID No. KYNP 63286

My Commission Expires:

January 22, 2027

