

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR AN ADJUSTMENT	)	
OF ITS ELECTRIC RATES AND APPROVAL OF	)	CASE NO. 2025-00113
CERTAIN REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
THE COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION
DATED OCTOBER 1, 2025

FILED: OCTOBER 10, 2025

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)


Michael E. Hornung

Cardine J. Davison
Notary Public

January 22, 2027



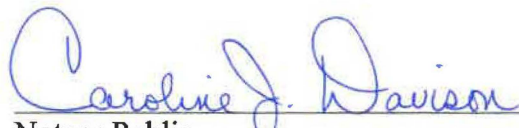
VERIFICATION

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, 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

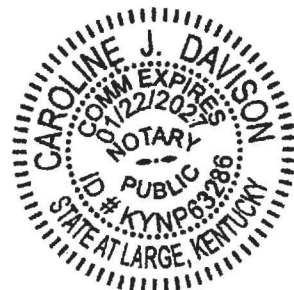
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 2nd day of October 2025.


Notary Public

Notary Public ID No. KYNPL3286

My Commission Expires:

January 22, 2027



KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's Fifth Request for Information
Dated October 1, 2025**

Case No. 2025-00113

Question No. 1

Responding Witness: Michael E. Hornung / Shannon L. Montgomery

- Q-1. Refer to the Application, Tab 4, page 180 of 204.
- a. Explain why customers who have their service disconnected must establish a minimum balance of \$30 to be reconnected, instead of being reconnected upon establishing a positive balance.
 - b. Explain why customers that leave the prepay program will not be allowed to return to the program for 12 months.
- A-1.
- a. The Companies proposed a minimum balance for reconnection because it provides customers approximately five days of prepaid service, preventing more frequent loss of service. The program does otherwise allow customers to add any amount to their balance at any time. In addition, notifications are planned to assist customers in adding to their accounts prior to reaching a zero balance that will result in disconnection.
 - b. A 12-month participation prohibition is common among many of the Company's optional rates and programs: RTOD-E (Tariff Sheet No. 6), RTOD-D (Tariff Sheet No. 7), GTOD-E (Tariff Sheet No. 11), GTOD-D (Tariff Sheet No. 12), and the Budget Payment Plan (Tariff Sheet No. 103). In keeping with the programs listed above, the Companies' intent is to manage the efficiency of the program and assist customers in maintaining utility service stability.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's Fifth Request for Information
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Case No. 2025-00113

Question No. 2

Responding Witness: Shannon L. Montgomery

Q-2. Refer to the Direct Testimony of Shannon L. Montgomery, page 25, line 20, through page 28, line 8. Explain whether any investor-owned utilities in other states offer similar programs to that proposed by KU.

A-2. The Companies researched the prepay programs of eight investor-owned utilities in other states. The Companies used this research to benchmark key elements its programs, such as the minimum starting account balance, to ensure they were reasonable when compared to the other utilities' programs. The utilities researched were:

Dominion South Carolina

Duke Energy North Carolina

Duke Energy South Carolina

Entergy Arkansas

Entergy Mississippi

Georgia Power

NV Energy

Public Service Company of Oklahoma

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's Fifth Request for Information
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Case No. 2025-00113

Question No. 3

Responding Witness: Shannon L. Montgomery

- Q-3. Refer to KU's response to the Office of the Attorney General and Kentucky Industrial Utility Customers First Request for Information, Item 48(e), Attachment. Provide the estimated savings assuming that paperless billing was made the default method for only new customers.
- A-3. See attachment being provided in a separate file.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's Fifth Request for Information
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Question No. 4

Responding Witness: Shannon L. Montgomery

- Q-4. Refer to KU's response to Commission Staff's Fourth Request for Information, Item 3. Confirm that live customer service representatives would be available after-hours to prepay customers whose service is disconnected due to the balance reaching zero after hours. If not confirmed, explain the response.
- A-4. Yes. Live customer service representatives are currently available 24/7 to assist with reconnection of service.