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February 26, 2010

VIA EXPRESS MAIL

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

MAR 01 2010

PUBLIC SERVICE
COMMISSION

RE: In the Matter of:
APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY, INC. FOR AN
ADJUSTMENT OF ELECTRIC AND GAS BASE RATES, CASE NO. 2009-00549

Dear Mr. Derouen:

Enclosed for filing in the above-captioned case are an original and eleven (11) copies of the First Request for Information of Association of Community Ministries to Louisville Gas and Electric Company.

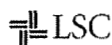
Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Lisa Kilkelly
Eileen Ordover
Attorneys for ACM

Cc: parties of record



COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAR 01 2010

In The Matter Of:

**PUBLIC SERVICE
COMMISSION**

**APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY FOR AN ADJUSTMENT OF)
ELECTRIC AND GAS BASE RATES)**

**CASE NO.
2009-00549**

**FIRST REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Association of Community Ministries ("ACM"), by counsel, requests the response of Louisville Gas and Electric Company ("LG&E") to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.
- (6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please state the average volume of natural gas used by residential customers for each month for calendar years 2007, 2008 and 2009.
2. Please state the total yearly volume of natural gas used by residential customers for calendar years 2007, 2008 and 2009.
3. Please provide the average residential gas bill for each month of the test year generated by the average volume provided in response to number 1 above broken down into its component parts (Customer Charge, Distribution Cost Component and Gas Supply Cost Component). Please specify the applicable rate of each component for each month.
4. Please provide the following information.
 - a) The average residential electric usage for each month of the test year.
 - b) The average residential electric bill for each month of the test year generated by the average usage provided in response to 4(a) above broken down into its component parts (Customer Charge and Energy Charge). Please specify the applicable rate of each component for each month.
5. How long will it take LG&E to recover the construction cost of the Trimble County Unit No. 2 ("TC2") if LG&E's current application is approved?
6. Please provide an itemized breakdown of the current cost for LG&E to:
 - a) disconnect a residential customer;
 - b) reconnect a residential customer.
7. Please provide the following information.
 - a) For calendar year 2009, state the number of residential gas customers required to make a deposit as a condition of reconnection following disconnection for non-payment.
 - b) Provide a breakdown of how many of the gas deposits listed in response to 7(a) above were charged in a lump sum and how many were charged in installments.
 - c) Of the lump sum gas deposits listed in response to 7(b) above, how many were paid in full?
 - d) Of the gas deposits charged in installments listed in response to 7(b) above, how many were paid in full?

e) For calendar year 2009, state the number of residential electric customers required to make a deposit as a condition of reconnection following disconnection for non-payment.

f) Provide a breakdown of how many of the electric deposits listed in response to 7(e) above were charged in a lump sum and how many were charged in installments.

g) Of the lump sum electric deposits listed in response to 7(f) above how many were paid in full?

h) Of the electric deposits charged in installments listed in response to 7(f) above, how many were paid in full?

8. Please provide the following information.

a) The cost during the test year to LG&E of its existing policy of allowing customers from whom a deposit is required as a condition of reconnection after disconnection to pay in installments and how such cost is calculated.

b) Describe all factors considered, data relied upon and any other analysis of any type that LG&E used in developing its proposed change to deposits, restricting the option to pay by installments to customers whom LG&E has not required a deposit as a condition of reconnection following disconnection for non-payment (described in the Testimony of John Wolfram, Page 5, Lines 1 – 8).

c) Copies of all materials and workpapers developed or reviewed in connection with such analysis described in 8(b) above.

9. Please provide the following information for a residential customer who has paid a \$295 deposit which is being held by LG&E and who is disconnected for nonpayment of a \$150 bill.

a) How much of the deposit would LG&E return to the customer? Please itemize any charges that LG&E would take out of the deposit.

b) Please provide the timeframe in which LG&E would return any remaining deposit to the customer.

10. Please state the monthly number of low income residential customers who were disconnected during the test year. Of these customers how many were subsequently reconnected?

11. Please describe any customer data available to LG&E relating to whether its residential customers are low income.

12. Please provide the following information.

a) The monthly number of disconnections for nonpayment for the residential electric class from July 1, 2008 through December 31, 2009.

b) The monthly number of disconnections for nonpayment of residential electric customers who received assistance from a third party agency for whom LG&E has assigned a pledge identification number from July 1, 2008 through December 31, 2009.

c) The monthly number of disconnections for nonpayment for the residential gas class from July 1, 2008 through December 31 2009.

d) The monthly number of disconnections for nonpayment of residential gas customers who received assistance from a third party agency for whom LG&E has assigned a pledge identification number from July 1, 2008 through December 31, 2009.

13. Please provide a list of all third party assistance agencies for whom LG&E has assigned a pledge identification number.

14. For each of the following programs:

a) State the number of residential customers who participated in such program during the test year, and

b) The number of residential customers who received an assistance payment from a third party agency for whom LG&E has assigned a pledge identification number who participated in such program during the test year;

(i) Budget Payment Plan

(ii) Automatic Bank Club

(iii) E - Bill

(iv) Installment plans.

15. Please provide the following information relating to installment plans as referred to in the Testimony of John Wolfram at Page 6, Line 22.

a) Describe the guidelines for installment plans.

b) Describe how customers are notified of their options under installment plans.

c) Provide copies of the guidelines and all training or instructional material related to installment plans.

16. Please provide the following information relating to late charges.

a) State the monthly amount of late charge revenue LG&E received from residential gas customers from October 1, 2008 to January 31, 2010.

b) State the monthly amount of late charge revenue LG&E received from residential electric customers from October 1, 2008 to January 31, 2010.

c) State the monthly amount of late charge revenue LG&E received from residential gas customers who received assistance from a third party agency for whom LG&E assigned a pledge identification number from October 1, 2008 to January 31, 2010.

d) State the monthly amount of late charge revenue LG&E received from residential electric customers who received assistance from a third party agency for whom LG&E assigned a pledge identification number from October 1, 2008 to January 31, 2010.

17. Please refer to the Testimony of William Steven Seelye at Page 11, Lines 1 through 5. Please describe in detail the experience referred to, including any data or studies, that forms the basis for Mr. Seelye's conclusions that low income customers tend to use more electric energy than the average.

18. Please provide the average monthly usage for the test year for residential customers who received assistance from a third party agency for whom LG&E assigned a pledge identification number for the following.

a) Gas

b) Electric

19. Please refer to the Testimony of Mr. Seelye at Page 46, line 8 and provide copies of all empirical studies referred to.

20. Please refer to the Testimony of Mr. Seelye at Page 46, Lines 10 through 12 and provide a copy of the study referred to therein.

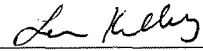
21. Please refer to the Testimony of Mr. Seelye at Page 46, Lines 12 through 18 and describe in detail the basis for the conclusions stated therein.

22. In materials pertaining to the LG&E rate case on the E-On website, (www.eon-us.com) LG&E has posted a map showing a comparison of the residential electric rates of the states surrounding Kentucky to the proposed LG&E rate. (Surrounding states are Missouri, Illinois, Indiana, Ohio, West Virginia, Virginia and Tennessee.) See attached.

a) Provide a comparison of LG&E's proposed gas rate to the rates of the surrounding states listed above.

b) Provide a comparison of LG&E's proposed rate of return to the rates of the surrounding states listed above.

Respectfully submitted,



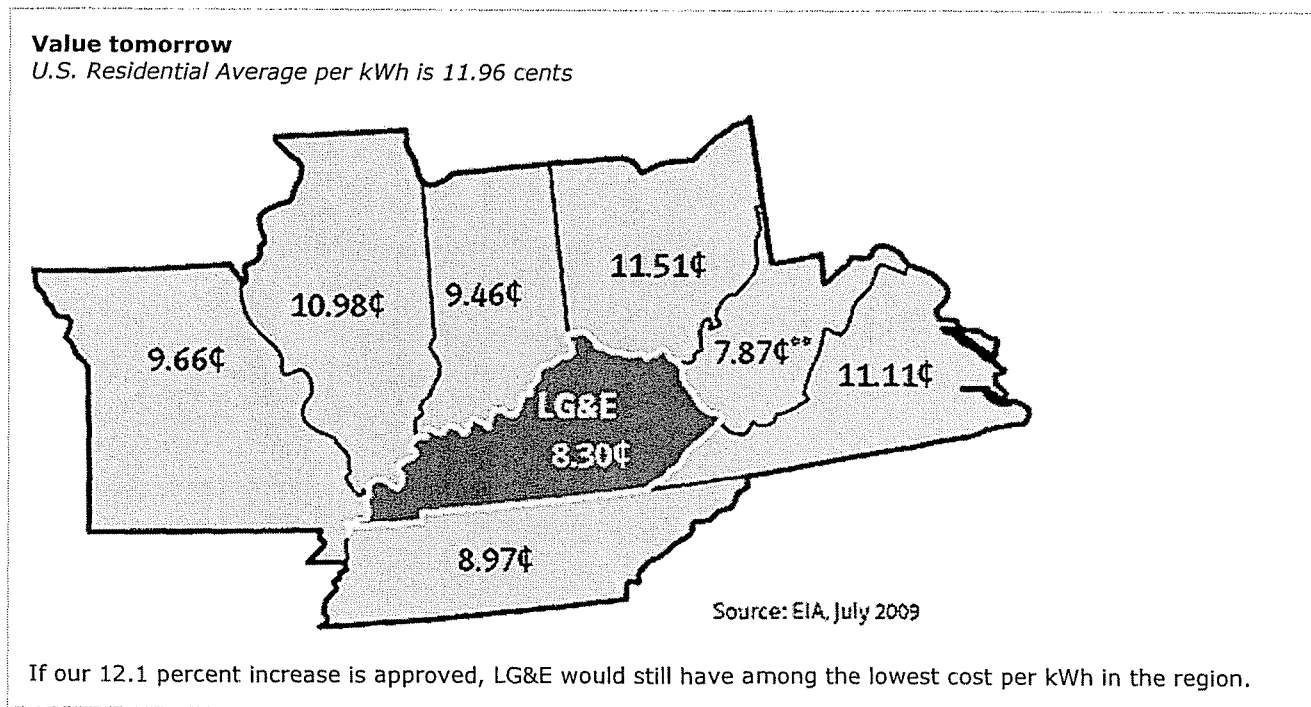
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Attorneys for ACM



LG&E Value

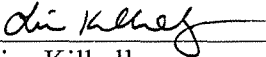
At LG&E we've been fortunate to have rates that are among the lowest in the nation, due in large part to cost of fuel.



PSC Case No. 2009-00549
Attachment to First Request for Information of Association of
Community Ministries to Louisville Gas and Electric Company
Question No. 22

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Request For Information Of Association Of Community Ministries To Louisville Gas And Electric Company was served on the following parties on the 26th day of February, 2010 by United States mail, postage prepaid.



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