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April 22, 2010

VIA HAND DELIVERY

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RECEIVED

APR 22 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 Testimony of Marlon Cummings on behalf 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,

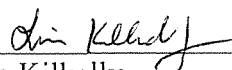
Lisa Kilkelly
Eileen Ordovery
Attorneys for ACM

Cc: parties of record



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Testimony of Marlon Cummings on behalf of Association of Community Ministries to Louisville Gas and Electric Company was served on the following parties on the 22nd day of April, 2010 by United States mail, postage prepaid.



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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CASE NO. 2009-00549

RECEIVED

APR 22 2010

PUBLIC SERVICE
COMMISSION

TESTIMONY OF
MARLON CUMMINGS

ASSOCIATION OF COMMUNITY MINISTRIES

ON BEHALF OF
ASSOCIATION OF COMMUNITY MINISTRIES

Filed: April 22, 2010

1 **Q. Please state your name, title and address.**

2 **A.** My name is Marlon Cummings and I am Treasurer of the Board of Directors of the
3 Association of Community Ministries (“ACM”). I have been appointed by the Board to
4 represent ACM in all low-income utility issues. My business address is P.O. Box 99545,
5 Louisville, Kentucky 40269.

6 **Q. Please describe ACM.**

7 **A.** ACM is a Kentucky 501(c)(3) nonprofit corporation and its membership is comprised
8 of 15 independent community ministries that provide services to the Louisville Metro
9 area. The common mission for all 15 members is to provide an emergency assistance
10 network in partnership with the Louisville Metro Government, local congregations, and
11 other businesses and organizations. Each Ministry serves a specific geographical area to
12 ensure that all of Louisville Metro is covered under the umbrella of the ACM. Among
13 the social services provided by ACM members are utility assistance programs.

14 **Q. Describe ACM’s activities regarding utility issues.**

15 **A.** Our member agencies provide utility assistance to low-income persons year round.
16 Our agencies help clients negotiate payment plans with the utility companies when they
17 fall behind, and help them avoid utility disconnections. The agencies obtain funding from
18 donations and local governments grants. These agencies also distribute Community
19 Winterhelp funds from January through April each year.

20 ACM utility assistance providers routinely refer customers to the federal LIHEAP
21 program when it is in operation. ACM is one of the joint applicants for the current
22 Louisville Gas & Electric Company Home Energy Assistance Program.

23

1 **Q. Describe your employment and educational background.**

2 **A.** Currently and for the past 12 years I have been Executive Director of Jeffersontown
3 Area Ministries, which is one of the member agencies of ACM and which provides
4 emergency utility and rental assistance and a variety of other social services to residents
5 in the Jeffersontown area. I have been on the Board of Directors of ACM since 1994. I
6 served the Jeffersontown Christian Church (Disciples of Christ), from 1985 until 1996, as
7 the Family and Youth Minister. I have a Bachelor of Arts in Business from Bellarmine
8 University and received my Minister's license from the Kentucky Region of the Christian
9 Church (Disciples of Christ) in conjunction with the Lexington Theological Seminary.

10 **Q. Have you previously testified before the Commission?**

11 **A.** Yes, I filed testimony in the last LG&E base rate case, Case No. 2008-00252, In the
12 Matter of Application of Louisville Gas and Electric Company for an Adjustment of its
13 Electric and Gas Base Rates on behalf of ACM and POWER. I have also filed testimony
14 in Case No. 2006-00045, In The Matter Of: Consideration of the Requirements of the
15 Federal Energy Policy Act of 2005 Regarding Time-based Metering, Demand Response
16 and Interconnection Service on behalf of Metro Human Needs Alliance and in Case No.
17 2007-00477, In the Matter of: An Investigation of the Energy and Regulatory Issues in
18 Section 50 of Kentucky's 2007 Energy Act on behalf of ACM.

19 **Q. What is the purpose of your testimony?**

20 **A.** I offer this testimony to state ACM's opposition to electric and gas increases for the
21 residential class of the size proposed by LG&E and to offer our perspective on the impact
22 of this proposal on low income customers. We also have some suggestions on steps
23 LG&E could take to assist low income customers.

1 **Q. Describe the needs that your agency currently sees with respect to your clients**
2 **who cannot pay their LG&E bills?**

3 Jeffersontown Area Ministries (JAM) is currently seeing an increase in the amount of
4 clients with large LG&E bills.

5 **Q. Is the level of need increasing? If so, how do you measure this?**

6 A. Yes. With the increase in basic living expenses such as food costs, gasoline costs,
7 utility costs, etc. clients are struggling to make ends meet. The overall increase in
8 requests for all services has been 30% in the past year. The amount of funds paid to
9 LG&E has increased 20%. Both figures are measured in comparison numbers from
10 Fiscal Year 2008-09 and Fiscal Year 2009-10.

11 **Q. Do ACM agencies have sufficient funds to help all those that request assistance?**

12 No. The amount of funds necessary to meet all requests for financial assistance is above
13 the amount of funds that are available.

14 A. **Q. What are the eligibility criteria for clients to be able to receive utility**
15 **assistance from ACM member agencies?**

16 A. Clients must live in the agency's service area and be in threat of disconnect of
17 service.

18 **Q. Describe the typical assistance that one of your agencies provides to a client**
19 **requesting utility assistance?**

20 A. We provide financial assistance to clients to enable them to maintain service for thirty
21 days. The amount of assistance depends on the quote that is given by LG&E that provides
22 30 days of service. Agency funds are used in conjunction with outside sources to secure
23 gas and/or electric services.

1

2 **Q. What is ACM's opinion of LG&E's proposed rate increase?**

3 A. LG&E estimates that its proposals will result in an increase in the average monthly
4 residential gas bill of 8.75% and an increase in the average monthly residential electric
5 bill of 12.19%.. A gas base rate increase of 3.9% was just approved effective February
6 2009, and it is too soon to impose an increase of this size on residential customers. The
7 proposed electric increase is substantially higher than was proposed in the last base rate
8 case. ACM believes that increases of the amount proposed by LG&E will jeopardize low
9 income households' ability to maintain basic utilities.

10 **Q. How do you think these increases will affect low income residential customers?**

11 A. LG&E has stated in its notice of the increase that an average monthly residential gas
12 bill will increase by \$4.65 and an average monthly residential electric bill will increase
13 by \$8.92. But we know that gas and electric bills fluctuate throughout the year and we
14 wanted to take a closer look at how these increases might affect our clients throughout
15 the year.

16 **Q. How did you analyze the proposed changes in the residential gas rate?**

17 A. First, we looked at the proposed change in the gas customer service charge and
18 elimination of the distribution cost component. In the Response No. 3 to ACM's First
19 Request for Information to LG&E ("ACM 1-3"), LG&E provided a listing of the average
20 residential gas usage and bill for each month of the test year, broken down into
21 component parts. We looked at the amounts generated by the customer charge and
22 distribution cost component for each month of the test year, and compared these to the
23 proposed customer charge of \$26.53. A chart setting forth these amounts is attached as

1 Exhibit 1 to my testimony. We did not factor in the Gas Supply Cost Component because
2 we wanted to focus on how the particular changes proposed would impact customer bills.
3 Nor did we factor in any of the other surcharges and credits that appear on customers
4 monthly bills.

5 **Q. What did you observe in looking at the proposed change in the residential gas**
6 **rate?**

7 A. We observed that the gas proposal would be expected to cause a significant increase
8 in customers' bills during the warmer months, when they traditionally have had lower gas
9 bills due to lower usage. During the colder months, we would expect to see some
10 decrease in these components of the gas bills. Additionally, in comparing the average
11 customer charge and distribution revenue throughout the test year with the proposed gas
12 customer charge, the increase was larger than we expected to see. As Exhibit 1 shows,
13 the difference between the test year components and the proposed customer charge is
14 \$76.22 over the year, or a monthly average of \$6.35, which is higher than LG&E's
15 projection of \$4.65.

16 **Q. Did you also look at the proposed changes in the residential electric rate?**

17 A. Yes. In Response No. 4 to ACM's First Request for Information ("ACM 1-4"),
18 LG&E provided us with the average residential electric bill for each month of the test
19 year broken down into its component parts generated by average residential usage. We
20 compared the average monthly residential bills for the test year to average monthly bills
21 at the proposed rates. We used the average residential consumption from the test year
22 and applied the proposed rates. Although we know that the average residential
23 consumption will vary from year to year, we felt that this exercise would provide

1 valuable insight into how the proposed rates will affect bills at different levels of usage
2 throughout the year. As with the gas bill analysis, we did not factor in any of the other
3 surcharges and credits that appear on customers monthly bills. These results are
4 contained in Exhibit 2 to my testimony.

5 **Q. What did you observe in looking at the proposed electric rate?**

6 Again, the increase was larger than we expected to see. Comparing the test year and
7 proposed rates yielded an increase of \$137.43 over the year, or an average monthly
8 increase of \$11.45, which is higher than LG&E's projected monthly increase of \$8.92.

9 **Q. Did you look at the impact of the gas and electric increases together?**

10 A. Yes. In Exhibit 3, we listed the test year average gas distribution revenue and
11 customer charge and the electric customer charge and energy revenue that LG&E
12 provided us in ACM 1-3 and 1-4 and added them together for a monthly test year
13 combined bill of these components at test year rates. We then added the proposed gas
14 customer charge to the proposed electric customer charge and energy revenue from our
15 Exhibit 2 for a monthly combined bill of these components at proposed rates. In Exhibit
16 4, we compared the combined test year and proposed bills and listed the monthly
17 increase.

18 **Q. What did you observe in looking at the combined bills?**

19 A. First, the increases are significant, averaging \$17.80 per month for these components
20 alone. Our analysis does not include any increases that may occur if the price of natural
21 gas increases, or if there are increases in any of the other surcharges on customer bills.
22 Second, the largest increases are likely to occur in the warmer months. This is
23 problematic because this is the time of year in which assistance agencies have the fewest

1 resources and there are fewer protections against disconnection. Many utility assistance
2 programs focus on winter months rather than summer. In Response No. 11 to ACM's
3 Second Request for Information ("ACM 2-11"), LG&E provided information showing
4 that during the test year, the highest numbers of disconnections among gas and electric
5 customers occurred during the months of May through October. (See ACM 2-11
6 columns (a) and (c).) Yet, as shown in Response No. 12 to ACM Second Request for
7 Information ("ACM 2-12"), LG&E receives the vast majority of third party assistance
8 during the winter months. If rate increases of this size are approved, we feel that all
9 agencies concerned with utility customers need to know that customers may experience
10 serious challenges in maintaining utility services during the summer.

11 **Q. LG&E witness William Steven Seelye stated with regard to the proposed**
12 **electric rate increase that "the typical low income customer would actually benefit**
13 **from a rate design that had a higher basic service charge and a lower energy charge,**
14 **as these customers, because of their higher usage, are currently helping to subsidize**
15 **low usage customers." (Seelye Testimony at Pages 10-11). Mr. Seelye made a**
16 **similar argument with regard to the proposed Straight Fixed Variable rate design**
17 **for gas. (Seelye Testimony at Pages 46-47). Would you support LG&E's proposed**
18 **rate increases on this basis?**

19 A. The proposed increases are too high. As far as rate design, I would need more
20 information in order to determine whether this type of change proposed would benefit
21 low income customers. For example, I would want to know the degree of benefit to low
22 income customers, such as how much of a difference there would be between different
23 rate designs and how much of a difference there would be between the average residential

1 customer and the average low income customer. Also, the data upon which Mr. Seelye
2 relies as to the difference in usage between the average customer and the low income
3 customer was produced for the last rate case and may be out of date due to changes in
4 usage levels. We would be interested in working with LG&E to study current usage rates
5 among low income customers and to discuss appropriate strategies to assist low income
6 customers.

7 **Q. Do you have other concerns about the proposal to make the customer charges**
8 **significantly higher?**

9 A. Yes. In some cases customers with more than one service will pay more per month
10 even if their consumption of energy is very low. For example, customers may have two
11 services, such as customers in rural areas that might have a barn or other structure with a
12 meter in addition to their residential meter, and one of the services is very low usage due
13 to conservation of heating or air conditioning. Even though the customer is purposely not
14 using electricity and/or gas in that service's area, a higher charge will be assessed.

15 The increase in the customer charge is also contradictory to the DSM initiatives that are
16 currently in place. LG&E collects money to fund DSM initiatives and now proposes to
17 do away with some of the costs associated with usage of energy. A customer that
18 conserves energy will not benefit from the proposed rate increase.

19 **Q. LG&E initially proposed a change in its deposit policy to require those who had**
20 **been disconnected for nonpayment to pay deposits in full before allowing**
21 **reconnection. According to Response No. 6 to ACM's Second Request for**
22 **Information ("ACM 2-6") LG&E has withdrawn this proposed change. What is**
23 **your opinion of this?**

1 A. We are pleased that LG&E has decided to forego making a change to its deposit
2 installment policy. The proposed change would have made it much harder for struggling
3 families to regain service by requiring a deposit in a lump sum. Even with a proposed
4 reduction in the deposit for gas customers, a \$275 deposit for combined customers is a
5 large amount for a low income family to pay at one time. Assistance agencies generally
6 cannot contribute this large of an amount.

7 **Q. In response to the Second Data requests of ACM numbers 7 and 8, LG&E**
8 **provided the number of disconnections for nonpayment of electric and gas**
9 **customers by zip code. What do you observe from these numbers?**

10 A. The zip codes with the highest number of disconnections are in the areas of the
11 highest levels of assistance to families in crisis according to the number of households
12 served by the ministries in those areas. The current poverty data provided by the 2000
13 census place the highest levels of poverty in the same areas as the disconnection rates for
14 LG&E.

15 **Q. Are current resources such as ACM agencies emergency assistance, LIHEAP,**
16 **Winterhelp and LG&E's Home Energy Assistance program sufficient to meet the**
17 **needs of low income utility customers?**

18 A. No.

19 **Q. What are some steps LG&E could take to assist low income customers?**

20 A. There are several things LG&E could do to assist low income customers. One
21 suggestion would be for LG&E to waive late fees for low income customers who receive
22 utility assistance payments.

23 **Q. Wasn't waiver of late fees addressed in the last LG&E base rate case?**

1 A. Yes, one of the terms of the settlement agreement included a provision for LG&E to
2 meet with other parties to discuss waiver of late fees for customers receiving utility
3 assistance. The parties did meet to discuss this, but have been unsuccessful in reaching an
4 agreement so far.

5 **Q. How would waiver of late fees help low income customers?**

6 A. Waiver of late fees would help low income clients stretch their limited dollars in
7 order to better afford utility service. Further, assistance agencies could apply their limited
8 funds to more clients if they did not have to pay late fees with assistance dollars.

9 **Q. Would waiver of late fees for assistance recipients cost LG&E a lot of money?**

10 A. No. In Response No. 16 to ACM's First Request for Information ("ACM 1-16"),
11 LG&E provided the dollar amount of late fees billed to residential gas and electric
12 customers from October 1, 2008 to January 31, 2010 and also the monthly amount of late
13 charge revenue received from residential gas and electric customers who received
14 assistance from a third party agency for whom LG&E assigned a pledge ID number for
15 the same period. These figures showed that the late fee revenue from assistance
16 recipients is a small percentage of what LG&E bills the residential class as a whole. In
17 the period from October 2008 through January 31, 2010, the late fee revenue from gas
18 customers who received assistance was 4.8% of the amount billed. Electric customers
19 who received assistance only provided 2.6% of the amount billed for the same period.
20 More importantly, LG&E is not losing this revenue. Assistance agencies would be able
21 to use funds that would go to pay late fees to help more customers. The money would
22 come to LG&E either way.

23 **Q. Are there other steps LG&E could take to assist low income customers?**

1 A. As mentioned above, we would be interested in working with LG&E to see what data
2 is available about its low income customers and to strategize about appropriate programs
3 or policies that might be of assistance. We also encourage LG&E to continue making
4 contributions to programs to assist low income customers. ACM encourages LG&E to
5 continue to provide funds for emergency assistance that can be used year round to assist
6 clients with their utility bills similar to the current Utility Match that is in place.
7 ACM would also suggest that LG&E allow its Customer Service representatives to
8 discuss payment arrangements for clients with agencies that provide assistance. This
9 would allow for case management to take place.

10 **Q. Does this conclude your testimony?**

11 A. Yes.

12

Application of Louisville Gas and Electric Company for Adjustment of Its Electric and Gas Base Rates
Case No. 2009-00549

Comparison of Average Residential Gas Bills at Test Year Rates and Proposed Rates

	Test Year Customer Charge	Test Year Distribution Cost Revenue	Test Year Customer Charge + Dist. Cost Rev.	Proposed Customer Charge	Monthly Difference
Nov - 08	\$8.50	\$7.19	\$15.69	\$26.53	\$10.84
Dec - 08	\$8.50	\$18.06	\$26.56	\$26.53	(\$0.03)
Jan - 09	\$8.50	\$22.28	\$30.78	\$26.53	(\$4.25)
Feb - 09	\$9.50	\$28.00	\$37.50	\$26.53	(\$10.97)
Mar - 09	\$9.50	\$19.97	\$29.47	\$26.53	(\$2.94)
Apr - 09	\$9.50	\$13.18	\$22.68	\$26.53	\$3.85
May - 09	\$9.50	\$5.63	\$15.13	\$26.53	\$11.40
Jun - 09	\$9.50	\$3.64	\$13.14	\$26.53	\$13.39
Jul - 09	\$9.50	\$2.96	\$12.46	\$26.53	\$14.07
Aug - 09	\$9.50	\$2.77	\$12.27	\$26.53	\$14.26
Sep - 09	\$9.50	\$2.84	\$12.34	\$26.53	\$14.19
Oct - 09	\$9.50	\$4.62	\$14.12	\$26.53	\$12.41
Total			\$242.14	\$318.36	\$76.22

Application of Louisville Gas and Electric Company for Adjustment of Its Electric and Gas Base Rates
Case No. 2009-00549

Comparison of Average Residential Electric Bills at Test Year Rates and Proposed Rates

	Average Residential Consumption	Test Year Customer Charge	Test Year Energy Revenue	Test Year Total	Proposed Customer Charge	Proposed Energy Revenue	Proposed Total	Monthly Difference
Nov - 08	709	\$5.00	\$45.43	\$50.43	\$15	\$46.86	\$61.86	\$11.43
Dec - 08	1,036	\$5.00	\$66.37	\$71.37	\$15	\$68.48	\$83.48	\$12.11
Jan - 09	1,190	\$5.00	\$76.24	\$81.24	\$15	\$78.66	\$93.66	\$12.42
Feb - 09	976	\$5.00	\$61.54	\$66.54	\$15	\$64.51	\$79.51	\$12.97
Mar - 09	817	\$5.00	\$51.48	\$56.48	\$15	\$54.00	\$69.00	\$12.52
Apr - 09	822	\$5.00	\$51.79	\$56.79	\$15	\$54.33	\$69.33	\$12.54
May - 09	718	\$5.00	\$45.26	\$50.26	\$15	\$47.46	\$62.46	\$12.20
Jun - 09	1,089	\$5.00	\$68.63	\$73.63	\$15	\$71.98	\$86.98	\$13.35
Jul - 09	1,305	\$5.00	\$86.87	\$91.87	\$15	\$86.26	\$101.26	\$9.39
Aug - 09	1,224	\$5.00	\$81.48	\$86.48	\$15	\$80.91	\$95.91	\$9.43
Sep - 09	1,185	\$5.00	\$78.88	\$83.88	\$15	\$78.33	\$93.33	\$9.45
Oct - 09	843	\$5.00	\$56.10	\$61.10	\$15	\$55.72	\$70.72	\$9.62
Total				\$830.07			\$967.50	\$137.43

Application of Louisville Gas and Electric Company for Adjustment of Its Electric and Gas Base Rates
Case No. 2009-00549

Comparison of Average Residential Gas and Electric Bills at Test Year Rates and Proposed Rates

	Test Year Gas CC + Dist. Rev.	Test Year Electric CC + En. Rev.	Test Year Gas and Electric	Proposed Gas Customer Charge	Proposed Electric CC + En. Rev.	Proposed Gas and Electric
Nov - 08	\$15.69	\$50.43	\$66.12	\$26.53	\$61.86	\$88.39
Dec - 08	\$26.56	\$71.37	\$97.93	\$26.53	\$83.48	\$110.01
Jan - 09	\$30.78	\$81.24	\$112.02	\$26.53	\$93.66	\$120.19
Feb - 09	\$37.50	\$66.54	\$104.04	\$26.53	\$79.51	\$106.04
Mar - 09	\$29.47	\$56.48	\$85.95	\$26.53	\$69.00	\$95.53
Apr - 09	\$22.68	\$56.79	\$79.47	\$26.53	\$69.33	\$95.86
May - 09	\$15.13	\$50.26	\$65.39	\$26.53	\$62.46	\$88.99
Jun - 09	\$13.14	\$73.63	\$86.77	\$26.53	\$86.98	\$113.51
Jul - 09	\$12.46	\$91.87	\$104.33	\$26.53	\$101.26	\$127.79
Aug - 09	\$12.27	\$86.48	\$98.75	\$26.53	\$95.91	\$122.44
Sep - 09	\$12.34	\$83.88	\$96.22	\$26.53	\$93.33	\$119.86
Oct - 09	\$14.12	\$61.10	\$75.22	\$26.53	\$70.72	\$97.25
Total	\$242.14	\$830.07	\$1,072.21	318.36	\$967.50	\$1,285.86

Application of Louisville Gas and Electric Company for Adjustment of Its Electric and Gas Base Rates
Case No. 2009-00549

Summary of Comparison of Average Residential Gas and Electric Bills at Test Year Rates and Proposed Rates

	Test Year Gas and Electric	Proposed Gas and Electric	Monthly Difference
Nov - 08	\$66.12	\$88.39	\$22.27
Dec - 08	\$97.93	\$110.01	\$12.08
Jan - 09	\$112.02	\$120.19	\$8.17
Feb - 09	\$104.04	\$106.04	\$2
Mar - 09	\$85.95	\$95.53	\$9.58
Apr - 09	\$79.47	\$95.86	\$16.39
May - 09	\$65.39	\$88.99	\$23.60
Jun - 09	\$86.77	\$113.51	\$26.74
Jul - 09	\$104.33	\$127.79	\$23.46
Aug - 09	\$98.75	\$122.44	\$23.69
Sep - 09	\$96.22	\$119.86	\$23.64
Oct - 09	\$75.22	\$97.25	\$22.03
Total	\$1,072.21	\$1,285.86	\$213.65

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON) **SS:**

The undersigned, Marlon Cummings, being duly sworn, deposes and says he is Treasurer of the Board of Directors of Association of Community Ministries, that he has personal knowledge of the matters set forth in the foregoing testimony, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


MARLON CUMMINGS

Subscribed and sworn to before me, this 22nd day of April, 2010.



NOTARY PUBLIC
KENTUCKY STATE AT LARGE

My Commission expires: 1-8-2013.