Kentucky Public Services Commission P O Box 615 211 Sower Road Frankfort, KY 40206-0615

## RECEIVED March 13, 2017

MAR 16 2017

**Public Service** 

Commission

Ref: Case no. 2016-00371

To whom it may concern,

My wife and I live in a 26 year old home in Crestwood, Oldham Co., Kentucky. When we moved here from Minnesota and built the house in 1990 we asked the builder to incorporate many of the energy savings features required by Minnesota codes. We were forced to compromise on many because our builder charged extra for those we added and wasn't convinced that the others were necessary.

Over the years we have invested other energy savings features, such as replacing 35 windows and doors for \$23,000 in 2010, and adding a 6 inch layer of commercial grade insulation in the attic. As a result our 4200 sq ft home consistently rates "Great" or "Good" in the Smart Energy Profile from Louisville Gas & Electric. (Exhibit 1)

Recently we received a notice from LG&E that it has filed a request with the KY Public Service Commission to more than double its Basic Service Charge for supplying electricity, from \$10.75 to \$22 per month. LG&E claims this will allow them to lower the per kilowatt-hour cost from \$.086 to \$.084 instead of raising it to \$.096. We do not support such a proposal because we feel that transferring more of the homeowners' monthly cost of energy to a fixed cost base punishes homeowners who have invested in efforts to make their homes more energy-efficient. LG&E's rationale, that this "will better protect customers from wild swings in monthly bills caused by Mother Nature", seems rather specious since customers have had an "even billing" payment option for many years. It would be interesting to know how many LG&E customers have selected this option. We have not done so because, though we live essentially on Social Security, our house is efficient and we are frugal with our energy demands.

Exhibit 2 displays our monthly electric charges from 2011 through 2016, broken down by all its components (except the "Homes Energy Assistance" charge). I apologize for the mind-numbing display of numbers but it is intended to serve a purpose. I'm not sure how LG&E calculates "cost per kWh" but I feel that it should include all of the adjustments to charges made on every bill to truly reflect the actual cost per kilowatt hour. If these are included the last time we were charged \$.086 per kWh was in 2011! And kWh charges passed the \$.096 level in 2013. (It should also be noted that from 2012 to 2013 our energy charge went down \$200 because of a 3300 kWh decrease in usage but the increase in the Basic Service Charge from \$8.50 to \$10.75 increased the overall charge per kWh from \$.087 to \$.096!)

Exhibit 3 demonstrates what would happen to our energy cost if the Basic Service Charge had been \$22 instead of \$10.75 in 2015 and 2016. Our total electric energy costs would have risen an additional 10% in 2016 without any increase in energy use or, said another way, an additional \$.013 per kWh. The Basic Service Charge component of the total cost would increase from 11.3% to 21.2%.

The impact would be even worse with the 2015 data. That year we used 1152 kWh less than 2016. Our electric energy costs would have risen 13.5% that year, from \$.107 per kWh to \$.121 per kWh. The Basic Service Charge component of the total cost that year would increase from 12.7% to 23.1%.

Incidentally, the same issue occurred when LG&E increased the Basic Service Charge for natural gas. Over the 2-year period 2009 through 2010 the BSC went up from \$8.50 to \$12.50. This resulted in the BSC jumping from the low teens as a percentage of our total natural gas expense to the middle to upper 20 percent, where it remains today. (Exhibit # 4)

In both cases a higher Basic Service Charge seems to create a perverse incentive on a homeowner to disregard energy savings efforts, as the reward for doing so is substantially undermined by the significant increase in fixed charges over which the homeowner has no control.

Just how a higher Basic Service Charge would create an incentive for LG&E to be more efficient in its supply and distribution of energy, or to support consumers who wish to seek more efficiency in their conservation of energy, is not clear to me.

Also, I no longer understand the concept behind the "Basic Service Charge". When it originally appeared in 2002 for both electric and gas I thought it may be justified to offset some of LG&E's administrative paper work required to service its customers. However, over the years it has grown from just over \$10 per month combined (see Exhibit 5) to almost \$25 per month since 2013. It also seems to be morphing into a mechanism to replace "even billing" by fixing some portion of their energy cost independent of weather's variability.

What is exceedingly clear is that this proposed level of increase in the Basic Service Charge is detrimental to homeowners who have been and continue to be interested in reducing their energy use. We urge the PSC to challenge LG&E to present an alternative to what they are proposing here that would produce more desirable outcomes.

Thank you for your time and attention to this matter.

Sincerely yours,

Gerald B Meier

Gerald B. Meier 4304 McCombs Circle Crestwood, KY 40014 502-241-1769

TIME PERIOD			RATING	ENERGY DIFFERENTIAL*
9/14/13	to	11/13/13	Great	20%
11/14/13	to	1/17/14	Great	14%
1/18/14	to	3/19/14	Great	4%
4/18/14	to	5/16/14	Great	43%
5/17/14	to	6/18/14	Great	66%
6/19/14	to	8/18/14	Great	28%
1/21/15	to	2/19/15	Good	-5%
4/18/15	to	5/16/15	Great	48%
5/17/15	to	6/18/15	Great	22%
6/19/15	to	7/18/15	Good	-13%
12/18/15	to	2/19/16	Great	9%
3/19/16	to	4/18/16	Great	28%
4/19/16	to	5/17/16	Great	24%
7/20/16	to	8/18/16	Good	-21%
8/19/16 2/16/17			Great Great	23% 32%

EXHIBIT # 1: Smart Energy Profile Reports for 4304 McCombs Circle

.

\* Measurement of the percentage reduction in energy use over similar efficient homes as reported by Louisville Gas & Electric

.

EXHIBIT # 2 Electric Use and Charges - Gerald B Meier household - 2011 through 2016 (based on month bill paid) Page 2-										Page 2-1			
	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTAL
2016													
Energy Charge	37.82	46.71	43.20	31.10	31.45	54.94	138.48	167.60	127.60	137.45	59.87	33.95	\$910
Basic Service Charge	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	\$129
kw usage	468	578	500	360	364	636	1603	1 <del>94</del> 0	1477	1591	693	393	10603
environmental sucharge	4.74	5.66	5.83	4.42	2.53	2.91	6.64	9.14	6.96	6.08	2.85	1.73	\$59
electric residential dsm (	1.67	2.29	1.99	1.43	1.26	2.2	5.55	6.71	5.11	5.5	2.4	1.36	\$37
fuel cost adjustment	-0.97	-1.57	-0.77	-0.08	-0.23	-1.63	-4.95	-5.22	-2.54	-2.1	-1.16	-0.47	-\$22
Adjusted Charge / kw	\$0.115	\$0.110	\$0.122	\$0.132	\$0.126	\$0.109	\$0.098	\$0.097	\$0.100	\$0.099	\$0.108	\$0.120	\$0.105
2015													
Energy Charge	43.13	52.49	58.23	38.12	30.04	26.33	88.19	129.03	127.37	112.74	32.49	25.38	\$764
Basic Service Charge	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	\$129
kw usage	534	650	721	472	372	326	1092	1597	1576	1395	402	314	<del>94</del> 51
environmental surcharge	3.07	3.83	4.29	3.03	2.55	2.67	7.95	11.99	11.69	11.64	4.05	3.52	\$70
electric dsm amt	2.9	3.65	4.12	2.7	1.93	1.7	5.68	5.69	5.61	4.97	1.43	1.12	\$42
fuel cost adjustment	-0.52	0.1	0.9	0.52	0.83	0.79	2.41	0.93	-1.01	-0.28	-0.05	-0.07	\$5
Adjusted Charge / kw	\$0.111	\$0.109	\$0.109	\$0.117	\$0.124	\$0.130	\$0.105	\$0.099	\$0.098	\$0.100	\$0.121	\$0.130	\$0.107
0014													
2014	54.40	40 50	00.00	44.04		~~ ~~			/-				
Energy Charge	54.13	49.59	66.22	44.01	35.62	33.03	34.89	100.79	59.12	84.23	29.4	35.78	\$627
Basic Service Charge	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	\$129
kw usage	681	614	820	545	441	409	432	1248	732	1043	364	443	7091
environmental sucharge	1.98	2.23	2.71	1.03	0.92	1.09	1.48	3.81	2.59	3.23	1.56	2.33	\$25
electric residential dsm {	2.44	2.7	3.6	2.39	2.39	2.22	2.35	6.78	3.97	5.66	1.98	2.41	\$39
fuel cost adjustment	-0.56	0.09	1.32	1.2	0.66	0.65	1.37	1.72	-0.14	0.58	0.05	0.02	\$7
Adjusted Charge / kw	\$0.101	\$0.106	\$0.103	\$0.109	\$0.114	\$0.117	\$0.118	\$0.099	\$0.104	\$0.100	\$0.120	\$0.116	\$0.117

EXHIBIT # 2 Electric use and Charges - Gerald B Meier household - 2011 through 2016 (based on month bill paid) Pa												Page 2-2	
	JAN*	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	ост	NOV	DEC	TOTAL
2013													
Energy Charge		101.69	75.28	64.42	67.55	55.35	81.83		134.02	107.15	47.46	46.34	\$934
Basic Service Charge		9.63	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	\$117
kw usage		1385	1012	866	908	744	1100		1686	1348	5 <del>9</del> 7	583	12156
environmental sucharge		0.98	1.08	0.44	0.95	1	1.58	3.69	3.51	3.01	1.63	1.67	\$20
electric residential dsm ar	nt	4.16	3.04	2.6	3.25	2.66	3.94		6.04	4.83	2.14	2.09	\$42
fuel cost adjustment		7.13	5.67	5.25	5.55	4.88	6.4		7.08	1	-0.12	0.24	\$54
Adjusted Charge / kw		\$0.089	\$0.095	\$0.096	\$0.097	\$0.100	\$0.095	\$0.096	\$0.096	\$0.094	\$0.104	\$0.105	\$0.096
2012													
Energy Charge	82.73	69.58	52.14	53.37	54.39	103.13	190.54	156.57	141.36	60.91	59.82	97.26	\$1,122
<b>Basic Service Charge</b>	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5	8.5	\$102
kw usage	1145	963	720	737	751	1424	2631	2162	1952	841	826	1343	15495
environmental sucharge	0.37	0.36	0.44	0.38	0.42	0.46	1.27	0.72	0.59	0.57	1.1	1.02	\$8
electricresidential dsm a	2.73	2.29	1.71	2.12	2.16	4.09	7.55	6.2	5.6	2.41	2.37	3.85	\$43
fuel cost adjustment	3.03	3.01	2.84	3.48	4.03	7.26	13.13	8.63	7.46	3.89	5. <del>9</del> 6	8	\$71
Adjusted Charge / kw	\$0.085	\$0.087	\$0.091	\$0.092	\$0.093	\$0.087	\$0.084	\$0.084	\$0.084	\$0.091	\$0.094	\$0.088	\$0.087
2011													
	81.42	55.2	50.68	40.78	42.97	92.73	150.79	181.13	07.07	20.05	50.00	70 50	<b>#054</b>
Energy Charge	8.5	55.Z 8.5	50.66	40.78	42.97 8.5	92.73 8.5	150.79	8.5	97.97	36.85	50.29	70.52	\$951 \$100
Basic Service Charge	6.5 1152	8.5 781	6.5 717	6.5 577	608	6.5 1312		8.5 2507	8.5	8.5	8.5	8.5	\$102
kw usage	0.18	0.88	0.68	0.73	0.54	1.57	2087 2.54		1356	510	696	976	13279
environmental sucharge electricresidential dsm a	4.03	2.73	2.51	1.16	0.5 <del>4</del> 1.22	3.2	2.54 5.09	0.37 6.12	0.21 3.31	0.09 1.24	0.13	0.22	\$8 \$25
	4.03	1.88	0.38	1.10		ے.∠ 5.48		8.37			1.7	2.38	\$35 \$30
fuel cost adjustment	3.30 \$0.085	\$0.089	\$0.088	1.3 \$0.091	1.41 \$0.090		8.68	-	3.17	1.13	2.14	2.19	\$39 \$0.086
Adjusted Charge / kw	φυ.υσο	Φ0.009	φ0.068	φ <b>0.0</b> 91	Φ <b>0.0</b> 80	\$0.085	\$0.084	\$0.082	\$0.083	\$0.094	\$0.090	\$0.086	\$0.086

\* Billing period adjusted - two months combined

EXHIBIT # 3: Impact of Proposed Increase in Basic Service Charge on Gerald B Meier Household Using 2016 Experience.

Page 3-1

	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTAL
2016 (actual)													
Energy Charge	37.82	46.71	43.2	31.1	31.45	54.94	138.48	167.6	127.6	137.45	59.87	33.95	\$910
Basic Service Charge	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	\$129
kw usage	468	578	500	360	364	636	1603	1940	1477	1591	693	393	10603
environmental sucharge	4.74	5.66	5.83	4.42	2.53	2.91	6.64	9.14	6.96	6.08	2.85	1.73	\$59
electric residential dsm a	1.67	2.29	1.99	1.43	1.26	2.2	5.55	6.71	5.11	5.5	2.4	1.36	\$37
fuel cost adjustment	-0.97	-1.57	-0.77	-0.08	-0.23	-1.63	-4.95	-5.22	-2.54	-2.1	-1.16	-0.47	-\$22
Adjusted Charge / kw	\$0.115	\$0.110	\$0.122	\$0.132	\$0.126	\$0.109	\$0.098	\$0.097	\$0.100	\$0.099	\$0.108	\$0.120	\$0.105
BSC as % of Total Cost	19.9%	16.8%	17.6%	22.6%	23.5%	15.5%	6.9%	5.7%	7.3%	6.8%	14.4%	22.7%	11.6%
	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTAL
2016 (adjusted for \$22 Ba				APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTAL
2016 (adjusted for \$22 Ba Energy Charge				APRIL 31.1	MAY 31.45	JUNE 54.94	JULY 138.48		SEPT 127.6	OCT 137.45	NOV 59.87	DEC 33.95	TOTAL \$910
	isic Servic	e Charge	9)					167.6					
Energy Charge	asic Servic 37.82 22 468	e Charge 46.71 22 578	e) 43.2 22 500	31.1 22 360	31.45	54.94	138.48	167.6 22	127.6	137.45	59.87	33.95	\$910
Energy Charge Basic Service Charge kw usage environmental sucharge	asic Servic 37.82 22 468 4.74	e Charge 46.71 22 578 5.66	e) 43.2 22	31.1 22	31.45 22	54.94 22	138.48 22	167.6 22 1940	127.6 22	137.45 22	59.87 22	33.95 22	\$910 \$264
Energy Charge Basic Service Charge kw usage environmental sucharge electric residential dsm a	asic Servic 37.82 22 468 4.74 1.67	e Charge 46.71 22 578 5.66 2.29	e) 43.2 22 500 5.83 1.99	31.1 22 360 4.42 1.43	31.45 22 364 2.53 1.26	54.94 22 636	138.48 22 1603	167.6 22 1940 9.14	127.6 22 1477	137.45 22 1591	59.87 22 693	33.95 22 393	\$910 \$264 10603
Energy Charge Basic Service Charge kw usage environmental sucharge electric residential dsm a fuel cost adjustment	asic Servic 37.82 22 468 4.74 1.67 -0.97	e Charge 46.71 22 578 5.66 2.29 -1.57	<ul> <li>43.2</li> <li>22</li> <li>500</li> <li>5.83</li> <li>1.99</li> <li>-0.77</li> </ul>	31.1 22 360 4.42 1.43 -0.08	31.45 22 364 2.53 1.26 -0.23	54.94 22 636 2.91	138.48 22 1603 6.64	167.6 22 1940 9.14 6.71	127.6 22 1477 6.96	137.45 22 1591 6.08	59.87 22 693 2.85	33.95 22 393 1.73	\$910 \$264 10603 \$59
Energy Charge Basic Service Charge kw usage environmental sucharge electric residential dsm a	asic Servic 37.82 22 468 4.74 1.67	e Charge 46.71 22 578 5.66 2.29	e) 43.2 22 500 5.83 1.99	31.1 22 360 4.42 1.43	31.45 22 364 2.53 1.26	54.94 22 636 2.91 2.2	138.48 22 1603 6.64 5.55	167.6 22 1940 9.14 6.71 -5.22	127.6 22 1477 6.96 5.11	137.45 22 1591 6.08 5.5	59.87 22 693 2.85 2.4	33.95 22 393 1.73 1.36	\$910 \$264 10603 \$59 \$37

EXHIBIT # 3: Impact of Proposed Increase in Basic Service Charge on Gerald B Meier Household Using 2015 Experience. Page											Page 3-2		
	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTAL
2015 (actual)													
Energy Charge	43.13	52.49	58.23	38.12	30.04	26.33	88.19	129.03	127.37	112.74	32.49	25.38	\$764
Basic Service Charge	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	10.75	\$129
kw usage	534	650	721	472	372	326	1092	1597	1576	1395	402	314	9451
environmental surcharge	3.07	3.83	4.29	3.03	2.55	2.67	7.95	11.99	11.69	11.64	4.05	3.52	\$70
electric dsm amt	2.9	3.65	4.12	2.7	1.93	1.7	5.68	5.69	5.61	4.97	1.43	1.12	\$42
fuel cost adjustment	-0.52	0.1	0.9	0.52	0.83	0.79	2.41	0.93	-1.01	-0.28	-0.05	-0.07	\$5
Adjusted Charge / kw	\$0.111	\$0.109	\$0.109	\$0.117	\$0.124	\$0.130	\$0.105	\$0.099	\$0.098	\$0.100	\$0.121	\$0.130	\$0.107
BSC as % of Total Cost	18.1%	15.2%	13.7%	19.5%	23.3%	25.4%	9.3%	6.8%	7.0%	7.7%	22.1%	26.4%	12.8%
	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	OCT	NOV	DEC	TOTAL
2015 (adjusted for \$22 Ba	asic Servic	e Charge	ə)										
Energy Charge	43.13	52.49	58.23	38.12	30.04	26.33	88.19	129.03	127.37	112.74	32.49	25.38	\$764
Basic Service Charge	22	22	22	22	22	22	22	22	22	22	22	22	\$264
kw usage	534	650	721	472	372	326	1092	1597	1576	1395	402	314	9451
environmental surcharge	3.07	3.83	4.29	3.03	2.55	2.67	7.95	11.99	11.69	11.64	4.05	3.52	\$70
electric dsm amt	2.9	3.65	4.12	2.7	1.93	1.7	5.68		5.61	4.97	1.43	1.12	\$42
fuel cost adjustment	-0.52	0.1	0.9	0.52	0.83	0.79	2.41	0.93	-1.01	-0.28	-0.05	-0.07	\$5
Adjusted Charge / kw	\$0.132	\$0.126	\$0.124	\$0.141	\$0.154	\$0.164	\$0.116	\$0.106	\$0.105	\$0.108	\$0.149	\$0.165	\$0.121
BSC as % of Total Cost	31.2%	26.8%	24.6%	33.1%	38.4%	<b>4</b> 1.1%	17.4%	13.0%	13.3%	14.6%	36.7%	42.3%	23.1%

EXHIBIT #4 Impact of BSC Increases on Natural Gas Costs - Gerald B Meier household - 2009 and 2010

	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPT	ОСТ	NOV	DEC	TOTAL
2010													
Basic Service Charge	9.5	9.5	9.5	9.5	9.5	9.5	9.5	11.32	12.5	12.5	12.5	12.5	127.82
gas supply cost component	79.59	64.19	48.14	8.56	4.18	4.15	4.67	9.87	4.3	3.69	3.46	53.32	288.12
distribution charge	34.59	26.47	19.21	3.42	1.71	1.71	1.92	3.74	1.57	1.34	1.34	22.17	119.19
Weather normalization adj	-4.48	-4.14	-0.38	0.18							-0.52	-1.92	-11.26
ccf usage	162	124	90	16	8	8	9	17	7	6	6	99	552
cost per ccf	\$0.75	\$0.79	\$0.86	\$1.37	\$1.94	\$1.31	\$1.25	\$1.19	\$1.92	<b>\$2.94</b>	\$2.81	\$0.88	\$0.92
gas residential DSM amt	1.82	1.39	1.01	0.22	0.11	0.11	0.13	0.23	0.09	0.08	0.08	1.31	6.58
Green DSM credit						-5	-5	-5	-5				-20
Total Gas	\$121.02	97.41	77.48	21.88	15.5	15. <b>47</b>	16.22	25.16	18.46	17.61	16.86	87.38	530. <b>45</b>
BSC as % of Total Cost	7.8%	9.8%	12.3%	43.4%	61.3%	61.4%	58.6%	45.0%	67.7%	71.0%	74.1%	14.3%	24.1%
2009													
Basic Service Charge	8.5	8.5	8.89	9.5	11.72	7.92	9.5	9.5	9.5	19	9.5	9.5	121.53
gas supply cost component	147.45	169.63	105.67	164.89	56.89	6.48	5.39	5.99	9.35	1.88	8.15	32.43	714.2
distribution charge	16.71	24.13	18.87	37.15	13.91	1.92	1.92	2.13	3.84	0.85	3.63	14.09	139.15
ccf usage	133	153	103	171	59	9	9	10	18	4	17	66	752
cost per ccf	\$1.31	\$1.33	\$1.31	\$1.25	\$1.41	\$1.82	\$1.32	\$1.27	\$0.99	\$4.19	\$1.26	\$0.87	\$1.28
gas residential DSM amt	1.42	1.83	1.19	1.97	0.54	0.08	0.08	0.09	0.17	0.04	0.16	0.61	8.18
Weather normalization adj											0.02	0.58	0.6
Demand Conservation Cred	it						-5	-5	-5	-5			-20
Total Gas			\$134.62		\$83.06	\$16.40	\$11.89	\$12.71	\$17.86	\$16.77	\$21.46	\$57.21	\$963.66
BSC as % of Total Cost	4.9%	4.2%	6.6%	4.4%	14.1%	48.3%	79.9%	74.7%	53.2%	113.3%	<b>4</b> 4.3%	16.6%	12.6%

EXHIBIT # 5 : LG&E Basic Service Charge Increases 2002 to 2016

		Electric			Gas		
Mo /Yr of increase	BSC Arr From	nount / mo To	Percent Increase	BSC Arr From	iount / mo To	Percent Increase	Combined BSC Charge / Month
1 / 2002	\$0.00	\$3.29		\$0.00	\$7.00		\$10.29
8 / 2004	\$3.29	\$5.00	52.0%	\$7.00	\$8.50	21.4%	\$13.50
4 / 2009				\$8.50	\$9.50	12.0%	\$14.50
8 / 2010	\$5.00	\$8.50	70.0%	\$9.50	\$12.50	31.6%	\$21.00
1 / 2013	\$8.50	\$10.75	26.5%	\$12.50	\$13.50	8.0%	\$24.25