

From: Melnykovych, Andrew (PSC)
To: ["Ordover, Eileen"](#)
Subject: your comments in case number 2017-00441 - Kentucky Utilities-Louisville Gas & Electric DSM case
Date: Friday, June 22, 2018 4:42:00 PM

Dear Ms. Ordover:

Thank you for your comments on the application of Kentucky Utilities Co. and Louisville Gas & Electric Co. regarding modification of their demand-side management programs.

Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration.

As you noted, the case number in this matter is 2017-00441. It would be helpful if you would please refer to it in any further correspondence.

The application and other documents in this case are available at http://psc.ky.gov/PSC_WebNet/ViewCaseFilings.aspx?case=2017-00441.

Thank you for your interest in this matter.

RECEIVED

By Kentucky PSC at 4:51 pm, Jun 22, 2018

Andrew Melnykovych

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From: Ordover, Eileen [REDACTED]
Sent: Tuesday, June 12, 2018 4:07 PM
To: PSC - Public Information Officer <PSC.Info@ky.gov>
Subject: Case No. 2017-00441/Comments of Association of Community Ministries/Correction

Attached for the Commission's consideration in Case No. 2017-**00441** please find **Comments of Association of Community Ministries, Inc.** The original submission (see below) contained a typographical error in the case number.

Eileen L. Ordover
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From: Ordover, Eileen
Sent: Tuesday, June 12, 2018 3:48 PM
To: psc.info@ky.gov
Subject: Case No. 2017-0041/Comments of Association of Community Ministries

Attached for the Commission's consideration in Case No. 2017-0041 please find **Comments of Association of Community Ministries, Inc.**

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

**In the Matter of: Electronic Joint Application of Louisville Gas and Electric
Company and Kentucky Utilities Company for Review, Modification, and
Continuation of Certain Existing Demand-Side Management and Energy Efficiency
Programs.
Case No. 2017-00441**

Comments of Association of Community Ministries, Inc.

Association of Community Ministries, Inc. (ACM) submits these comments to highlight the critical role the Companies' WeCare program serves and to advocate for its continuation. ACM has participated as an intervenor in prior DSM/EE cases involving WeCare, and was one of the joint applicants for LG&E's current Home Energy Assistance ("HEA") Program.

ACM is an umbrella organization made up of the 15 independent community ministries in Louisville/Jefferson County that administer and distribute emergency assistance funds to low income LG&E customers who cannot afford their energy bills.¹ ACM member agencies help clients at risk of disconnection negotiate payment plans with LG&E, and provide funds sufficient to help them maintain service for thirty days. This assistance averts an immediate crisis, but does not bring long-term stability. To achieve the latter, low income customers need to reduce their energy usage so that they may reduce their utility bills. As the Companies have recognized, however, low income customers cannot afford the array of energy efficiency measures accessible to more affluent ratepayers. That is where WeCare comes in, and why it is a critical resource.

¹ Each community ministry serves a discrete part of Louisville/Jefferson County, and is supported by member churches and faith-based groups based in its service area. In addition to emergency assistance with utility bills, the ministries help with rent and prescriptions. Many provide additional services for people living in poverty such as food pantries, clothes closets and help with transportation.

Information developed in this proceeding helps illustrate why it is important that WeCare continue. According to data provided by the Companies in response to Question 9 of Metropolitan Housing Coalition’s Second Set of Data Requests, average monthly kWh usage for Jefferson County zip codes decreased by 11.6% between 2011 and 2017. Among zip codes with high rates of people living in poverty, decreases were as low as 4.4% (40208), 7.1% (40203), 7.8% (40209), 8.1% (40212) and 8.7% (40211).

WeCare serves a financially fragile population. Like LIHEAP, WeCare is currently limited to households with incomes at or below 130% of the federal poverty level. Using the 2018 U.S. Department of Health and Human Services Poverty Guidelines,² for a family of four this means a maximum annual income of \$32,630, and for a single-person household \$15,782. Many of the clients ACM agencies refer to WeCare subsist on even less. For those who are elderly or disabled and living on Supplemental Security Income (“SSI”), for example, the maximum monthly benefit is currently \$750 for an individual, and \$1,125 for a married couple (where both spouses are elderly or disabled).

Incomes at these levels do not allow for much investment in energy efficiency. Further, according to a recent study by the American Council for an Energy-Efficient Economy,³ WeCare-eligible households spend more than twice as much of their income on energy bills than do Louisville households as a whole. The study, which looked at energy burden in 48 U.S. cities, found that in the Louisville Metropolitan Statistical Area

² Available at <https://aspe.hhs.gov/poverty-guidelines>.

³ *Lifting the High Energy Burden in America’s Largest Cities: How Energy Efficiency Can Improve Low Income and Underserved Communities*, American Council for an Energy-Efficient Economy (2016), available at <http://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden_0.pdf>

the median energy burden for low income households is 7.6%, compared with 3.57% for households overall. Some low income households are paying much more: among the 25% of low income households with the highest energy burden, the median is 12.74% of income.

The array of energy efficiency measures that only WeCare provides reduces the energy burden on low income ratepayers, affording them a greater degree of energy stability. ACM members routinely refer our energy insecure clients to WeCare, and have collaborated with LG&E to register clients for the program on-site at the ministries. Please see that this critical resource remains available.

Respectfully submitted,

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By: /s/ Marlon Cummings
Marlon Cummings
Treasurer and Board Representative on Low Income
Utility Issues

Date: June 12, 2018

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