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 A
CERTIFICATE OF PUBLIC CONVENIENCE AND
NECESSITY FOR FULL DEPLOYMENT OF
ADVANCED METERING SYSTEMS

CASE NO. 2018-00005

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO METROPOLITAN HOUSING COALITION

Metropolitan Housing Coalition ("MHC"), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on June 8, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.
MHC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which MHC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, MHC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Cathy Hinko ("Hinko Testimony"), page 11, which states, "[i]f the cost/benefit horizon were extended to 25 years instead of 20, it would completely change the ratio of costs to savings to ratepayers." Explain whether Ms. Hinko is suggesting that the Commission should find that, if the AMS request is approved, LG&E should be authorized to depreciate the AMS meters over 25 years.

2. Refer to Hinko Testimony, pages 7 and 13, which discuss the constraints that exist for low-income persons to access the proposed web-based portal. Explain whether MHC is aware of other methods of communicating a household's energy use that could assist low-income households in adjusting their energy consumption patterns in order to realize significant savings.
3. Refer to Hinko Testimony, page 13, which states, "MHC has shown that access to the data by low-income persons is not as easy as was stated by LG&E." Also refer to Hinko Testimony, Exhibit 2, which is a printout from a website with information on Cricket cell phone plans.

   a. Explain the basis for selecting Cricket cell phone plans to demonstrate costs for cell phone data.

   b. Explain whether MHC reviewed cell phone data plans offered by Lifeline providers.

Gwen R. Pinson
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Public Service Commission
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DATED MAY 29 2018

cc: Parties of Record

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*Denotes Served by Email  
Service List for Case 2018-00005