

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SANCTUARY CHURCH	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2018-00181
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company (LG&E), pursuant to 807 KAR 5:001, shall file with the Commission the original and five copies of the following information. The information requested herein is due no later than September 10, 2018. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked. 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.

LG&E 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 LG&E 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, LG&E shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

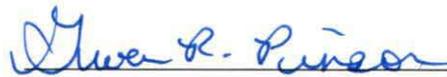
1. Refer to LG&E's Answer, Exhibit A. Provide the kW consumption and kWh consumption for Sanctuary Church for June, July, and August 2018.
2. From the demand data provided in Exhibit A, it appears that Sanctuary Church's high demand occurs during the months of May through December and that the 12-month average ending May 2018 was 61.6 kW. Explain whether LG&E has engaged in any discussions with Sanctuary Church regarding potential demand saving measures that could be implemented to reduce Sanctuary Church's demand consumption. Provide a copy of all documentation related to such discussions.

3. Provide a copy of any correspondence between LG&E and Sanctuary Church related to the issue of Sanctuary Church being moved from General Service Rate (Rate GS) to Power Service Rate (Rate PS).

4. Provide a copy of Sanctuary Church's bills for each month from May 2016 to August 2018.

5. Provide a copy of Sojourn Church's bills for each month from January 2014 to April 2016.

6. For each month from May 2016 through August 2018, provide a comparison of the monthly bill for Sanctuary Church for services rendered under Rate PS versus the amount that would have been billed under Rate GS.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED     **AUG 27 2018**    

cc: Parties of Record

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