COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC INVESTIGATION OF HOME)	
ENERGY ASSISTANCE PROGRAMS OFFERED)	CASE NO.
BY INVESTOR-OWNED UTILITIES PURSUANT)	2019-00366
TO KRS 278.285(4))	

ORDER

The Commission, on its own motion, initiates this proceeding to investigate home energy assistance (HEA) programs offered by investor-owned jurisdictional utilities pursuant to KRS 278.285(4). HEA programs provide financial assistance to eligible low-income residential customers who are unable to pay their utility bills. The primary benefit of HEA programs to eligible low-income customers is an increased ability to pay for a necessary commodity—utility service. For ratepayers who are not eligible to participate in HEA programs, the primary benefit is a reduction in utility costs, and thus a reduction in rates as a result of avoided costs that would otherwise be incurred from debt collection and from writing off uncollectible accounts. As discussed below, the Commission is concerned about the operational effectiveness, accountability, and fairness of current HEA programs. We initiate this proceeding for the purpose of creating uniformity in HEA programs across the Commonwealth and ensuring effective and accountable HEA programs that are consistently applied, more beneficial to and easily accessed by eligible low-income customers, and result in increased benefits to all ratepayers.

BACKGROUND

In 2001, the Kentucky Legislature revised KRS 278.285 to authorize HEA programs as part of the demand-side management (DSM) programs¹ that jurisdictional utilities can offer to their customers. ² Since then, the Commission has approved HEA programs in DSM and general rate cases filed by Kentucky Power Company (Kentucky Power), Louisville Gas and Electric Company (LG&E), Kentucky Utilities Company (KU), Duke Energy Kentucky (Duke Kentucky), Kentucky American Water Company (Kentucky-American), Columbia Gas Company (Columbia), and Delta Natural Gas Company (Delta).

Eligibility for HEA programs varies across the different jurisdictional utilities, as documented in the spreadsheet developed by Commission Staff that is attached as Appendix C to this Order. However, typically, eligibility is based on household income relative to the federal poverty level.

HEA programs offered by jurisdictional utilities are funded in three ways: by a monthly per meter surcharge collected from ratepayers, by voluntary donations, and by shareholder funds. Regarding the monthly meter surcharge, KRS 278.285 provides that the cost of HEA programs be assigned only to the customer class that benefits from the programs. Thus, monthly meter-based surcharges that fund HEA programs and benefit residential customers can only be assessed on residential customer meters.

¹ Demand-side management programs are designed to reduce energy consumption through specific measures, such as rebates for energy-saving products, weatherization, and education.

² 2001 Kentucky Laws Ch. 11 (H.B. 305).

There are three types of HEA programs offered by jurisdictional utilities: (1) crisis bill payment, with funds to pay a discrete bill; (2) subsidy bill payment assistance, when monthly payments are made during peak energy use months; and (3) weatherization. For the purpose of this proceeding, we will address only the crisis bill payment and subsidy bill payment assistance programs because the meter surcharge goes towards these two programs, and not the weatherization assistance programs. Additionally, the Commission distinguishes between HEA programs offered by jurisdictional utilities and the Kentucky Low Income Home Energy Assistance Program (LIHEAP), which is a federally funded program that provides benefits to supplement a household's annual energy cost through crisis bill payment assistance programs, ongoing programs, and weatherization programs.

DISCUSSION

As recent cases have made clear, HEA programs offered by jurisdictional utilities vary greatly and have raised a host of concerns. In Case No. 2017-00179, the Commission denied Kentucky Power's request to increase an economic development per meter surcharge and instead eliminated that surcharge while increasing the per meter fee for Kentucky Power's HEA program by an equivalent amount based upon the Commission's finding that the increase in the surcharge, as proposed, was "insufficient to address demonstrable need to assist eligible low-income customers with their electric bills." In Case Nos. 2018-00294 and 2018-00295, the Commission was informed that

³ Case No. 2017-00179, Electronic Application of Kentucky Power Company for (1) A General Adjustment of Its Rates for Electric Service; (2) An Order Approving Its 2017 Environmental Compliance Plan; (3) An Order Approving Its Tariffs and Riders; (4) An Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities; and (5) An Order Granting All Other Required Approvals and Relief (Ky. PSC Jan. 18, 2018). Final Order at 37.

the nonprofit agencies that administer KU's and LG&E's respective HEA programs had not spent all available HEA program funds.⁴ In Case No. 2018-00370, the Commission scheduled a hearing to take evidence regarding Duke Kentucky's HEA program, especially in light of unspent HEA funds, lack of program audits, and excessive administrative fees paid to a nonprofit agency without validation against the actual costs to administer the HEA program.⁵

Conversely, the Commission commended utilities that promote accountability and effectiveness. In Case No. 2018-00358, the Commission commended Kentucky-American for contracting with a nonprofit agency to administer Kentucky-American's HEA program for almost 50 percent less than the program administrator and adding shareholder funds when available monies ran out before the end of the year.⁶ In Case No. 2018-00311, the Commission approved programs jointly proposed by Kentucky Power and Community Action of Kentucky (CAK)⁷ that broadened Kentucky Power's HEA programs, focused on credits during peak heating months, and increased the number of customers assisted.⁸

⁴ Case No. 2018-00294, Electronic Application of Kentucky Utilities Company for an Adjustment of Its Electric Rates, March 6, 2019 Hearing Video Transcript (HVT) at 3:26:26–3:35:40; Case No. 2018-00295, Electronic Application of Louisville Gas and Electric Company for an Adjustment of Its Electric and Gas Rates, March 6, 2019 Hearing Video Transcript (HVT) at 3:26:26–3:35:40.

⁵ Case No. 2018-00370, Electronic Annual Cost Recovery Filing for Demand Side Management by Duke Energy Kentucky, Inc., July 31, 2019 HVT at 9:47:06, 9:49:01, and 10:29:21.

⁶ Case No. 2018-00358, *Electronic Application of Kentucky-American Water Company for an Adjustment of Rates* (Ky. PSC June 27, 2019), final Order at 87–89.

⁷ CAK is a statewide association that represents and supports 23 Community Action agencies in Kentucky. CAK has significant experience in providing a variety of services that promote economic stability.

⁸ Case No. 2018-00311, Electronic Joint Application of Kentucky Power Company and Community Action Kentucky, Inc. to: 1) Expand and Modify Home Energy Assistance Program; 2) Approve the Amended Operating Agreement; 3) Approve Voluntary Energy Assistance Fund; 4) Approve Revised Tariff Sheets; and 5) Grant All Other Relief (Ky. PSC October 30, 2018).

From our review of HEA programs in recent proceedings, the Commission has observed that:

- Programs are not equally funded;
- Requirements for participation are not consistent from program to program.
 Utilities require different levels of participation in their other programs or add additional criteria to eligibility standards to qualify for a subsidy or crisis payment;
- All households potentially eligible for services do not have an equal opportunity to apply for and receive benefits;
 - Available benefits differ from utility to utility in terms of:
 - amount of subsidy or crisis payment received;
 - number of months the program is available;
 - how funds are allocated and criteria for allocation; and
 - number of households served.
 - Oversight responsibility is inconsistent and sometimes non-existent;
- Administrative fees vary greatly without significant differences in corresponding services delivered;
- There is not a consistent effort across utility service territories by program administrators to enroll eligible households, resulting in an unequal distribution of services, which are supposed to be based on the number of customers per county within the service area.

For the reasons set forth above, the Commission initiates this proceeding to investigate HEA programs offered by investor-owned utilities to determine what actions

may be necessary to create, to the extent possible, uniformity in eligibility, funding, and access to HEA programs.

IT IS THEREFORE ORDERED that:

- This proceeding is opened to examine HEA programs offered by investorowned jurisdictional utilities.
- Kentucky Power, LG&E, KU, Duke Kentucky, Kentucky-American,
 Columbia, and Delta are made parties to this proceeding and shall be served with a copy of this Order.
- All parties shall adhere to the procedural schedule set forth in Appendix A to this Order.
- 4. Kentucky Power, LG&E, KU, Duke Kentucky, Kentucky-American, Columbia, and Delta shall file with the Commission an original and an electronic version of the information requested in Appendix B to this Order. The information requested is due within 20 days of the date of this Order.
- 5. Pursuant to 807 KAR 5:001, the parties shall file with the Commission an original and an electronic version of any responses to requests for information that complies with the following requirements:
- a. Responses to requests for information in paper medium 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.

- c. 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.
- d. A party 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.
- e. For any request to which a party 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.
- f. 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.
- g. Any party filing a paper containing personal information shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.
- 6. Pursuant to 807 KAR 5:001, Section 8(10), within seven days of entry of this Order, each utility listed in ordering paragraph 2 of this Order shall file a written statement with the Commission that:

- a. Certifies that they possess the facilities to receive electronic transmissions; and
- Sets forth the electronic mail address to which all electronic notices
 and messages related to this proceeding should be served.
- 7. As set forth in 807 KAR 5:001, Section 4(11)(a), a person requesting permissive intervention in a Commission proceeding is required to demonstrate either (1) a special interest in the proceeding which is not adequately represented in the case, or (2) that the person requesting permissive intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings. Further, KRS 278.040(2) requires that a person seeking intervention must have an interest in the rates or service of a utility, as those are the only matters that are subject to the Commission's jurisdiction. Therefore, any person requesting to intervene in a Commission proceeding must state with specificity the person's special interest that is not otherwise adequately represented, or the issues and facts that the person will present that will assist the Commission in fully considering the matter. In addition, any motion to intervene filed after the date for intervention set forth in the procedural schedule in Appendix A, shall also show good cause for being untimely. If the untimely motion is granted, the movant shall accept and abide by the existing procedural schedule.
- 8. Pursuant to KRS 278.360 and 807 KAR 5:001, Section 9(9), a digital video recording shall be made of any hearing.

By the Commission

ENTERED

OCT 28 2019

KENTUCKY PUBLIC SERVICE COMMISSION

ATTEST:

Executive Director

APPENDIX A

AN APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2019-00366 DATED OCT 2 8 2019

Requests for intervention shall be filed by
All requests for information to parties shall be filed no later than
Parties shall file responses to initial requests for information no later than
All supplemental requests for information to parties shall be filed no later than
Parties shall file responses to supplemental requests for information no later than
Parties and Intervenors, if any, shall file comments and recommendations no later than
Parties and Intervenors, if any, shall file responses to comments and recommendations no later than
Last day for Parties to publish notice of hearing To be scheduled
Public Hearing to be held in Hearing Room 1 of the Commission's Offices at 211 Sower Boulevard, Frankfort, Kentucky, for the purpose of cross-examination of witnesses of KU and intervenors

APPENDIX B

AN APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2019-00366 DATED OCT 2 8 2019

- 1. Refer to Appendix C to this Order, which contains utility-specific HEA program eligibility criteria, funding and administration data, and annual budgets and disbursements. Confirm that the information in Appendix C applicable to your utility (Utility) is accurate or, if any information is not accurate, provide the updated information.
- 2. Explain how the Utility selected the agency that administers its HEA application process.
- 3. Describe in specific detail all aspects of the Utility's oversight of the agency that administers HEA applications.
- 4. Explain in specific detail how the agency that administers the Utility's HEA application process is paid, e.g., a fixed amount per application, a percentage of budgeted or expended funds, or a lump sum.
 - 5. For each of the Utility's HEA programs, provide the following information:
 - a. The number of applicants in the last full program year.
- b. The number of applicants in the last full program year who were eligible for each HEA program.
- c. The number of eligible applicants in the last full program year who received assistance from each HEA program.
- Provide the average benefit level paid for participants in each of the Utility's
 HEA programs.
- 7. State how often in the past five years that funds generated by the Utility's HEA charge were not fully expended and explain what happens to funds not expended.

- 8. Describe in specific detail how the Utility's HEA programs are advertised or communicated to customers. Provide all marketing materials.
- State whether the Utility or the agency that administers the HEA program
 measures how applicants learned of the HEA program and, if so, provide the data for the
 last full program year.

APPENDIX C

AN APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2019-00366 DATED OCT 2 8 2019

	LG & E	Duke Energy	KU		Ke	Kentucky- American	CAC						
Program Criteria	- ASAI -	HEA -	KHE -	HEAR	PROPOSED HEART	HEART (Donation)	THA	PROPOSED THAW	DEAP -	EAP -	H2O (Help to Others)	WinterCa	
Active Utility Customer (Residential)	X	×	x	×	×	×	×	×	x	×	×	10 P	
Service in Applicant's Name	×	2000	×	×		×	×		×	×	TO STATE OF	×	
>>> Qualify for LIHEAP	×	DOM:	×		L		<u>i </u>					15-	
Be Enrolled in LIHEAP (and direct payments to Utility)	×		X.	×	i i	×	i		×	×			
Earn no more than:												Stories	
LIHEAP Maximum ¹	-	Testile.	- 177		!!!		!				0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		
200% Federal Poverty		III tu les		×	×		Town I				×		
150% Federal Poverty	1000	×									L. L. N. T.	×	
130% Federal Poverty	×		×	PART TO	14.14.					×			
110% Federal Poverty						×			x				
Earnat least \$100/mo	×												
Apply and Accept Weatherization Services (If Available)	×	DATE OF STREET	×	X		×			×	×	The state of the state of	3	
Not Reside in a Multi-Unit Single Meter Building	×			×	i x i	×	i						
Have arrears (past due balance):				S. Ind.	iii	NAME OF TAXABLE PARTY.	1	i				Ser.	
Not more than 59 days late		E 8 80		×	1 ×	×	×					III.	
Not more than \$1000	×		1		!!!		!	!					
Provide (Monthly) Access to Meters		-		×	!!!	×	•	!			The second second		
Enroll in an average monthly payment plan (budget)			The Trail	×	!	×	!						
Agree that no benefit will be paid in cash to the participant		100000	1111	×	×	×	112						
(Not have received HEART funds)	DV 100						×	×				25	
(Not have received THAW funds)				×	×	×	All Lands				- STUZINO		
Not have service discontinued				×	×	×	×	×			E V	100-1	
(Use electricity as principal source of heating)	- 100	HIM S	×			×					TIDE TO SHEET WAS	B	
(Use gas as principal source of heating)			-						×	×		71	
Be responsible for home heating costs ²					1 1	×	i	i		-			
(Not have presented Utility with a dishonored check more than once)					1 1		×	×					
(Not have engaged in fraudulent conduct)	-21-1						×	1					
(Qualify for at least \$200 ASAP benefit) - based on income and energy bills	×				the state of		!	!					
Must attend mandatory energy education session / orientation	×				1 1				-				
											INCOME.		
Have liquid monetary assets that do not exceed: \$1500 ³						×							
Have liquid monetary assets that do not exceed: \$4000 ⁴						×							
Requires annual renewal / requalification	×		×	×	×	×			×	×			
Demonstrate hardship			1	-	1 1		1 .	×		-			
Demonstrate his damp					i i		i	i				1	
Outstanding Balance of at least \$50.00				200	1		•				×	100	
outstanding balance of at least \$50.00	The second										^		
Minimum Payment within 60 days of at least \$25											×		
Millindin Payment within 60 days of at least \$25			1	-							^		
Funds from LIHEAP and WinterCare must be exhausted		×			 								
(Not operate a high energy usage in-home business)	×												
(Maintain good standing with payments)	×											-	

		Active		Administrativ						Benefit		Benefit		Active	Most Recent	
	Utility	Year(s)	Administrator	e Expenses	Type	(Oversight)	Program(s)	Funding Type(s)	Recovery / Funding	Calculation	Benefit Form	Amount	Term	Months	Annual	Rollove
	LG & E		AEC / ACM	10%		Annual CPA	ASAP	Meter Charge (Residential)	\$0.25/Meter	Formula	Credit to Bill	\$1000	yearly		\$ 2,186,040)
NED	A MARKET					Audit		Shareholder Contribution	\$180,000		/Subsidy/	(Max)			*2018	
Z							ACM Assist	Shareholder Contribution	\$700,000		Arrears					
5	Duke Energy	2008-	NKCAC	15%1	"Agree	Annual	HEA	Meter Charge (Residential)	\$0.10/Meter	Case-by-Case	Crisis	\$300.00	yearly		\$ 261,42	5 N
		Present		5%?	ment"	Benott ²					Assistance	_(Max) ⁵ _			*FY17-18	
	KU		CAC / CAK	10%		Annual Audit	KHEA	Meter Charge (Residential)	\$0.30/vr	Fixed / Set	Credit to Bill	88	monthly	Dec - Mar.	\$ 2,052,874	
							300000	Shareholder Contribution	\$470,000	Benefit	/ Subsidy	-		Jul - Sep	*2018	
		2018-	CAK		"Agree	Annual CPA		Meter Charge (Residential, Matched by		Fixed / Set	Credit to Bill	\$115.00.	monthly	Jan - Apr		
	Kentucky Power	Present*	(formerly	7%	ment"	Audit	HEART	Kentucky Power) (75%)	\$0.30/Meter	Benefit	/ Subsidy	\$58.00 ⁴		3.000 3.000	\$ 764,68	. Y
	Kentucky Fower	A A CONTRACTOR OF THE PARTY OF	KACA)	7.70	Contract.			Donations (Matched up to \$20,000.00 by	20/30/Weter		A Section Control	900.00			J. 704,00	
	AND THE REAL PROPERTY.		AMISSION.					Kentucky Power)	Up to \$40,000.00/yr						*2018	
							THAW	Meter Charge (Residential, Matched by	CP 10 340,000.00/ y1	CACharad	Credit to Bill	\$175.00	venely	Jan - Apr	2010	
				10%			THE V	Kentucky Power) (25%)	\$0.30/Motor			(Max)	yearry	Jan - Mpr		
								Manually Control (120/0)	30.30/14/6161	- Un circula	7 Sabsidy	- Italay				
	Delta Natural Gas	2006*	CAC	\$13,000	"PSC	EAP	(D)EAP	Meter Charge (Residential)	\$0.20/Meter	Fixed / Set	Credit to Bill	410	yearly	Nov - Mar		
					Order"	Reconciliatio		Annual contribution ³	\$30,000	Benefit	/ Subsidy					
	Columbia Gas		CAC				EAP	Volumetric Charge	\$0.0541/Mcf	Fixed / Set	Credit to Bill	600	yearly	Nov - Mar	\$ 675,000)
	MANAGEMENT PRAY							Annual contribution (shareholder)	\$200,000	Benefit	/ Subsidy		100000000000000000000000000000000000000			
		2017-	Dollar Energy		"Agree			Company Contributions and Customer		DEF on Case-	Grant /	\$125	yearly			
	Kentucky	Present	Fund, Inc.		ment"			Donations - Possibility of matched		by-Case	Crisis?	(Max)	- Vin this			
	American Water			8.75%			KUAP	conributions by DEF, Inc.							\$ 62,500	
1	Duke Energy		CAC	5%				Annual Contribution	\$25,000							
	Control of the contro							Matched Donations	Up to \$25,000		Payment	\$300				
	KU		CAC					Annual Contribution		Case-By-Case		(Max)	yearly			
	Columbia Gas		CAC					Annual Contribution	\$45,000		Utility	,,,,,,				
-	Coldinate des								J-13,000			********				

¹ NKCAC receives 15% of funds 'disbursed'

Duke has never performed a formal audit of NKCAC. The 'report' mentioned here is a budget

The wording 'Contribution' is misleading. This cost is recovered through general rates

Heat Customers, Non-Heat Customers

A maximum of 5300.00 total in conjunction with WinterCare funds annually

Utility	Program	Year	Meter Charge		Utility Conation / Contrib	tal Amount		Customer Benefits	Ad	min Costs		rrearage rgivenes	No. of Participants	Disconne ctions	Admin Cost (% of funds Collected)	Admin C. (% of funds disbursed
		2009	\$ 1,117,183	\$	184,711	\$ 1,301,894	\$	1,561,997	\$	100,588	\$	79,855			7.7%	6.4
		2010	\$ 1,166,442	\$	181,391	\$ 1,347,833	\$	897,481	\$	116,142	\$	40,645	1,513	530	8.6%	12.9
		2011			306,487	\$ 1,469,415	\$	1,095,951	\$	114,000	\$		1,967		7.8%	10.4
11		2012	\$ 1,241,043	\$	303,729	\$ 1,544,772	\$	1,498,436	\$	114,000	\$	50,986	2,475		7.4%	7.6
LG&E	ASAP	2013	\$ 1,944,714	\$	180,000	\$ 2,124,714	\$	1,610,868	\$	198,276	\$	31,143	2,515		9.3%	12.3
LUGE	AJAF	2014											2,846			
		2015														
			\$ 1,980,440										2,501	953		
		2017														
		2018	\$ 2,006,040	\$	180,000	\$ 2,186,040	_		_							
		2009	\$ 735,216	\$	121,664	\$ 856,880	\$	688,862	\$	63,905		n/a			7.5%	9.3
		2010	\$ 772,281	\$	120,306	\$ 892,587	\$	736,113	\$	89,449			4,043	15	10.0%	12.2
		2011	\$ 766,013	\$	243,513	\$ 1,009,526	\$	796,532	\$	72,000			3,802		7.1%	9.0
- 70 - 19		2012	\$ 816,697	\$	246,271	\$ 1,062,968	\$	800,668	\$	86,236			3,597	0.00	8.1%	10.8
KU	KHEA	2013	\$ 1,280,480	\$	307,500	\$ 1,587,980	\$	1,371,920	\$	84,000			3,511		5.3%	6.1
NO.	KHEA	2014				\$ -							3,278			
		2015				\$ 1,291,364							2,691	1,053		
		2016				\$ 1,298,842							2,698	983		
		2017				\$ 1,438,246							2,696	1,049		
		2018	\$ 1,582,874	\$	470,000	\$ 2,052,874	_		_		_					
W. A. I	HEART	2018	\$ 286,756	\$	286,756	\$ 573,512					_	n/a	2,072			
Kentucky	THAW	2018	\$ 95,585	\$	95,585	\$ 191,171						- M /	1,530			
Power	Total	2018	\$ 382,341	\$	382,341	\$ 764,682	_						3,602			
107720		2011		_		\$ 288,886	\$	201,640	\$	30,246	_	n/a	1,006	98	10.5%	15.00
		2012				\$ 248,098	\$	242,047	\$	36,307			1,431	100	14.6%	15.0
		2013				\$ 251,240	\$	198,830	\$	29,824			989	O. C.	11.9%	15.09
		2014				\$ 251,652	\$	261,001	\$	39,150			1,307		15.6%	15.09
		2015				\$ 253,804	\$	129,589	\$	19,435			621		7.7%	15.09
Duke Energy	HEA	2016				\$ 256,196	\$	252,300	\$	37,845			1,331		14.8%	15.09
		2017				\$ 258,401	\$	267,415	\$	40,112			1,410		15.5%	15.09
		2018				\$ 261,425	\$	214,095	\$	27,925			1,016		10.7%	13.09
		2019												1		
		(YTD		_		\$ 197,300	\$	119,332	\$	17,890			747	A.	9.1%	15.09
10.00000		2008		\$	50,000	\$ 50,000	_		_		_	n/a				
2 10 3 3		2009		\$		50,000										
		2010		\$		\$ 60,000										
Kentucky	H20	2011		\$	60,000	\$ 60,000										
American		2012		\$	60,000	\$ 60,000										
		2018				\$ 62,686			\$	4,636				Qu.	7.4%	
		2019		_		\$ 62,500	_		\$	4,906	_	_			7.8%	
0 11 11		2014	\$ 560,880	\$	175,000	\$ 735,880	\$	903,842	_			n/a				
Columbia	EAP	2015	\$ 434,574	\$	175,000	\$ 609,574	\$	920,439								
Columbia	EAP	2016	\$ 474,918	\$	200,000	674,918										
		*2018			200,000	675,000										

*Kentucky-American Water Company Kentucky-American Water Company 2300 Richmond Road Lexington, KY 40502

*Kentucky Power Company Kentucky Power Company 855 Central Avenue, Suite 200 Ashland, KY 41101

*Duke Energy Kentucky, Inc. Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45202

*Columbia Gas of Kentucky, Inc. Columbia Gas of Kentucky, Inc. 290 W Nationwide Blvd Columbus, OH 43215

*Delta Natural Gas Company, Inc. Delta Natural Gas Company, Inc. 3617 Lexington Road Winchester, KY 40391

*Kentucky Utilities Company Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*Louisville Gas and Electric Company Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010