

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

|                                  |   |            |
|----------------------------------|---|------------|
| ELECTRONIC EMERGENCY DOCKET      | ) | CASE NO.   |
| RELATED TO THE NOVEL CORONAVIRUS | ) | 2020-00085 |
| COVID-19                         | ) |            |

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY  
AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company and Kentucky Utilities Company (collectively, LG&E/KU), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on October 8, 2020. The Commission directs LG&E/KU to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses 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. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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/KU shall make timely amendment to any prior response if LG&E/KU obtains information that indicates 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/KU fails or refuses to furnish all or part of the requested information, LG&E/KU 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/KU 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/KU's October 2, 2020 Petition for Clarification and Deviation and Request for Expedited Treatment (Petition), page 3, paragraph 4, where LG&E/KU state that they "cannot feasibly create and apply *en masse* a single default payment plan to all residential customers with arrearages."

a. Explain the technological limitations that prohibit LG&E/KU from applying a single payment plan.

b. Reconcile this declared inability to provide a default payment plan with LG&E/KU's statement on page 3, paragraph 4, of the Petition that they will provide a "backstop default twelve-month payment plan" for customers who do not otherwise choose a different payment plan.

2. Refer to the Petition, page 3, paragraph 5, where LG&E/KU state they "will publicize the availability of payment plans on their websites . . . ."

a. Describe the payment plans that will be offered on the website.

b. State whether the website will inform customers of the right to a six-month default payment plant.

c. State whether the website will inform customers of the "backstop" twelve-month default plan.

3. State whether LG&E/KU will offer, at a minimum, a six-month payment plans for arrearages of \$75 or less if a customer requests a payment plan.



Kent A. Chandler  
Acting Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED     OCT 05 2020    

cc: Parties of Record

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