



a PPL company

Mr. Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

June 30, 2011

RECEIVED

JUN 30 2011

PUBLIC SERVICE
COMMISSION

**Louisville Gas and Electric
Company**

State Regulation and Rates
220 West Main Street
PO Box 32010
Louisville, Kentucky 40232
www.lge-ku.com

Rick E. Lovekamp
Manager - Regulatory Affairs
T 502-627-3780
F 502-627-3213
rick.lovekamp@lge-ku.com

**RE: *NORMAN D. VERNON V. LOUISVILLE GAS AND
ELECTRIC COMPANY DEFENDANT - CASE NO. 2010-00130***

Dear Mr. DeRouen:

Enclosed please find an original and ten (10) copies of Louisville Gas and Electric Company's Response to the Commission Staff's Requests for Information in its June 20, 2011 Order - Appendix B, in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

Rick E. Lovekamp

cc: Norman D. Vernon

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

	NORMAN D. VERNON)	
	COMPLAINANT)	CASE NO.
)	2010-00130
V.)	
	LOUISVILLE GAS AND ELECTRIC COMPANY)	
	DEFENDANT)	

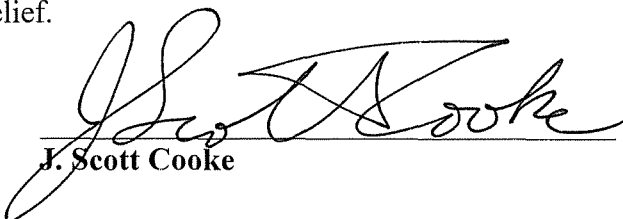
RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
INFORMATION REQUESTED IN APPENDIX B OF THE
COMMISSION'S ORDER DATED JUNE 20, 2011

FILED: June 30, 2011

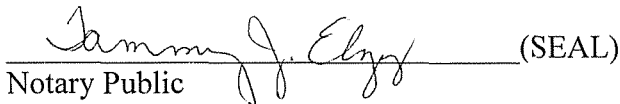
VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, J. Scott Cooke, being duly sworn, deposes and says that he is Manager – Meter Design Strategy & Operations for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


J. Scott Cooke

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 29th day of June 2011.


Notary Public (SEAL)

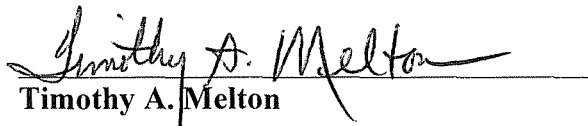
My Commission Expires:

November 9, 2014

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Timothy A. Melton**, being duly sworn, deposes and says that he is Manager – Customer Commitment for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.


Timothy A. Melton

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 29th day of June 2011.

 (SEAL)
Notary Public

My Commission Expires:

November 9, 2014

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

	NORMAN D. VERNON)	
	COMPLAINANT)	CASE NO.
)	2010-00130
V.)	
	LOUISVILLE GAS AND ELECTRIC COMPANY)	
	DEFENDANT)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
INFORMATION REQUESTED IN APPENDIX B OF THE
COMMISSION'S ORDER DATED JUNE 20, 2011

FILED: June 30, 2011

LOUISVILLE GAS AND ELECTRIC COMPANY

Response to Information Requested in Appendix B of the
Commission's Order Dated June 20, 2011

Case No. 2010-00130

Question No. 1

Witness: Scott Cooke

- Q-1. Refer to LG&E's Answer, Exhibit A, Pages 1 and 2 of 3.
- a. These pages appear to be identical. Confirm that this is correct and, if confirmed, explain whether LG&E intended to submit a duplicate of Page 1 of 3 or whether it intended to submit something in addition to Page 1 of 3.
 - b. Explain the entries on the last yellow line under the heading "Meter Test History Data."
- A-1.
- a. The data on the right side of page 1 was truncated; the intent was to show the section that was truncated from page 1 on page 2. Attached is a copy of the full screen print showing the meter test results.
 - b. Date Tested: 01/01/1900 (default date for new un-tested meters) To see the Meter Service History Data section of the CIS Archive to get the date the meter was tested and status changed to STOCK, 4/11/1996.

Test Reas Cd: Abbreviation for Test Reason Code. 'NMT' is the abbreviation for New Meter Test.

Location: this value not entered for a new meter test since all new meters are tested in the shop.

Repair Code: 'A' indicates a new meter test with no repairs.

The purpose of an As Found test is to test the accuracy of a meter as it was found with no adjustments after it was removed from a premise and brought to the Meter Shop. With new meters, LG&E is only concerned with the accuracy of the meter right before it is set so the initial test or As Found test is not important but the As Left test result is important because it represents the accuracy of the meter before it is used. In between the As Found test and the As Left test the Meter Tester may perform some adjustments to get the meter within the required accuracy specification.

New meters are tested for leaks and only As Left tests results are tracked. Open Proof are tests at 100% of flow capacity of the meter and Check Proof are tests at 20% of flow capacity.

As Found Average: The As Found Average is the average of the As Found Open Proof test and the As Found Check Proof test. Since the As Found tests are not performed on new meters, the value defaults to zero. The average of two zeros is zero.

As Found Open Proof: The As Found Open Proof test is not performed on new meters and the value defaults to zero.

As Found Check Proof: The As Found Check Proof test is not performed on new meters and the value defaults to zero.

As Left Average: -0.15 is As Left Average percent error, minus sign indicates slow ($(\text{As Left Open} + \text{As Left Check})/2$).

As Left Open Proof: -0.30 is As Left Open Proof percent error.

As Left Check Proof: 0. (zero percent error)

Leak Test: Y means the meter was tested for leaks and no leaks were found.

In Reading: The In Reading is blank because the meter had not been used when it was shipped to the Meter Shop.

Out Reading: The Out Reading of 0 signifies that it is a new index on this new meter. No usage on the index yet.

Device Type		Device Number		Find									
G		517508											
Gas Meter History													
Meter Data	Meter Nbr	Serial Nbr	Stk Code	Premise	Purchase Date	Orig Inst Date	Cur Inst Date	Cur Test Date	En Number	# Of Disks	Multiplier	Meter Type Code	Meter Type Desc
	517508	517508	JUNKED	7006520180	09/27/1995	09/27/1995	04/22/1996	02/10/2009	0	4	0.02	041	10H 38 MET002
Meter Service History Data													
	Install Date	Stk Code	Premise	Location Code	Tras Code	Removal Date	Removal Reading	Install Reading	House Nbr	Street	City	State	Zip
	02/10/2009	JUNKED	7006520180	XXX		01/22/2009	042386 0001	0001	116	CHERRY HILLS	LOUISVILLE	KY	40245
	01/22/2009	REMOVED	7006520180	L					116	CHERRY HILLS	LOUISVILLE	KY	40245
	04/23/1996	INSTALLED	7006520180	L									
	04/17/1995	STOCK		XXX									
Meter Test History Data													
	Date Tested	Test Resp Cd	Location	Repair Code	As Found Average	As Found Open Proof	As Found Check Proof	As Left Average	As Left Open Proof	As Left Check Proof	Leak Test	In Reading	Out Reading
	02/10/2009		ST SHOP	XXX	-0.75	-1.10	-0.40	0	0	0	Y	003385	000000
	01/01/1900		INT	A	0	0	0	-0.15	-0.30	0	Y	000000	000000

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Information Requested in Appendix B of the
Commission's Order Dated June 20, 2011**

Case No. 2010-00130

Question No. 2

Witness: Scott Cooke

- Q-2. Refer to the CD attached to LG&E's Response to Commission Staff's First Data Request, Item 1, which was a recording of a conversation held between an LG&E customer representative and Mr. Vernon on January 21, 2009.
- a. During the conversation, Mr. Vernon was provided a number to call to request a new meter. Explain whether LG&E received a request to have the meter changed at 116 Cherry Hills Lane, Louisville, Kentucky.
 - b. If yes to a., explain whether Mr. Vernon's request prompted LG&E to test the meter under its sample meter testing program.
 - c. If yes to a., explain why Mr. Vernon was not informed that the meter would be tested and the results of the test.
- A-2.
- a. No. LG&E was unable to locate any recording or request from Mr. Vernon requesting a meter exchange at 116 Cherry Hills Lane, Louisville, Kentucky.
 - b. Although Mr. Vernon did not request a meter change, Meter number 517508 located at 116 Cherry Hills Lane, Louisville, Kentucky was randomly selected via computer programming as part of the 2009 LG&E Gas Meter Performance Control Program (meter sampling).
 - c. As noted in response to a, LG&E was unable to locate any record of a request test service order for 116 Cherry Hills Lane, Louisville, Kentucky. Customers whose gas meter is randomly selected for sample testing are mailed letters that explain the pending sample test and request the customer to contact LG&E to schedule a meter change.

Meter number 517508 located at 116 Cherry Hills Lane, Louisville, Kentucky was exchanged January 22, 2009 with meter number 630843. LG&E typically does not notify customers with the results whose meter was tested for the sample test program unless the meter test exceeds the +/- 2% error.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Information Requested in Appendix B of the
Commission's Order Dated June 20, 2011**

Case No. 2010-00130

Question No. 3

Witness: Timothy A. Melton

- Q-3. Refer to LG&E's Response to Commission Staff's First Data Request, Items 1 and 3. LG&E indicates that Mr. Vernon contacted LG&E on December 28, 2001; February 11, 2004; December 19, 2005; and January 21, 2009 concerning his natural gas usage and that he was offered a meter test on January 21, 2009. Explain why Mr. Vernon was not offered a meter test on the other occasions that he contacted LG&E concerning his natural gas usage.
- A-3. Due to limited information in customer account notes, LG&E cannot affirm or deny that customer was offered a meter test in 2001, 2004 or 2005.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to Information Requested in Appendix B of the
Commission's Order Dated June 20, 2011**

Case No. 2010-00130

Question No. 4

Witness: Scott Cooke

- Q-4. Provide the following information concerning the testing of Meter No. 517508.
- a. Explain where the meter was taken upon removal from Mr. Vernon's home.
 - b. If the response to 4a. was not the testing location, provide the testing location and state when the meter was transported to the testing location.
 - c. Provide the name of the company that performs LG&E's meter testing.
 - d. Explain whether the testing was performed by an individual certified to perform such testing and the individual's certification date.
 - e. Explain whether the testing equipment used to test the meter was certified and the certification date.
- A-4.
- a. Removed gas meters are delivered to the LG&E gas meter shop located at 6900 Enterprise Drive, Louisville, Kentucky 40214.
 - b. N/A
 - c. Energy Economics Inc, a LG&E contractor, is under contract to LG&E to operate their gas meter shop facilities and they test the LG&E gas meters.
 - d. The Energy Economics employee was and is certified by the KPSC to test gas meters. Certificate number G0384. The certificate date is June 11, 2001. Tester was previously employed by LG&E and certified to test gas meters by the KPSC September 12, 1985, certification number 0384.
 - e. The test equipment (Sonic Nozzle Prover #1) used to test meter number 517508 was certified January 28, 2008. Sonic Nozzle Prover #1 has since been certified on June 16, 2009 and June 15, 2010.