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**PUBLIC SERVICE
COMMISSION**



a PPL company

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

**Louisville Gas and
Electric Company**
State Regulation and Rates
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August 28, 2014

**RE: TRACY MATHIS V. LOUISVILLE GAS AND ELECTRIC
COMPANY-
Case No. 2014-00198**

Dear Mr. DeRouen:

Enclosed please find an original and ten (10) copies of the Response of Louisville Gas and Electric Company to the Commission Staff's First Request for Information in the above-referenced docket.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rick E. Lovekamp', is written over a light blue horizontal line.

Rick E. Lovekamp

cc: Tracy Mathis

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TRACY MATHIS)	
)	
COMPLAINANT)	
)	
v.)	CASE NO.
)	2014-00198
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
)	
DEFENDANT)	

* * * * *


RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
AND PRODUCTION OF DOCUMENTS
DATED AUGUST 14, 2014

FILED: AUGUST 28, 2014

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **John K. Wolfe**, being duly sworn, deposes and says that he is Director – Electric System Restoration and Distribution 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.



John K. Wolfe

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 28th day of August 2014.



Notary Public (SEAL)

My Commission Expires:

SHERI L. GARDNER
Notary Public, State at Large, KY
My Commission expires Dec. 24, 2017

Notary ID # 501600

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to
Commission Staff's First Request for Information
and Production of Documents
Dated August 14, 2014**

Case No. 2014-00198

Question No. 1

Witness: John K. Wolfe

Q-1. Provide photographs of the overhead service wire at issue in this matter.

Photos are to include:

- a. The service pole at or near 163 Crescent Avenue, Louisville, Kentucky, where service wire at issue originates;
- b. The service wire as it crosses over the front yard at 163 Crescent Avenue, Louisville, Kentucky, to neighbor's home; and
- c. The connection to the neighbor's home where service wire enters the neighbor's home.

A-1. See photographs attached.







LOUISVILLE GAS AND ELECTRIC COMPANY

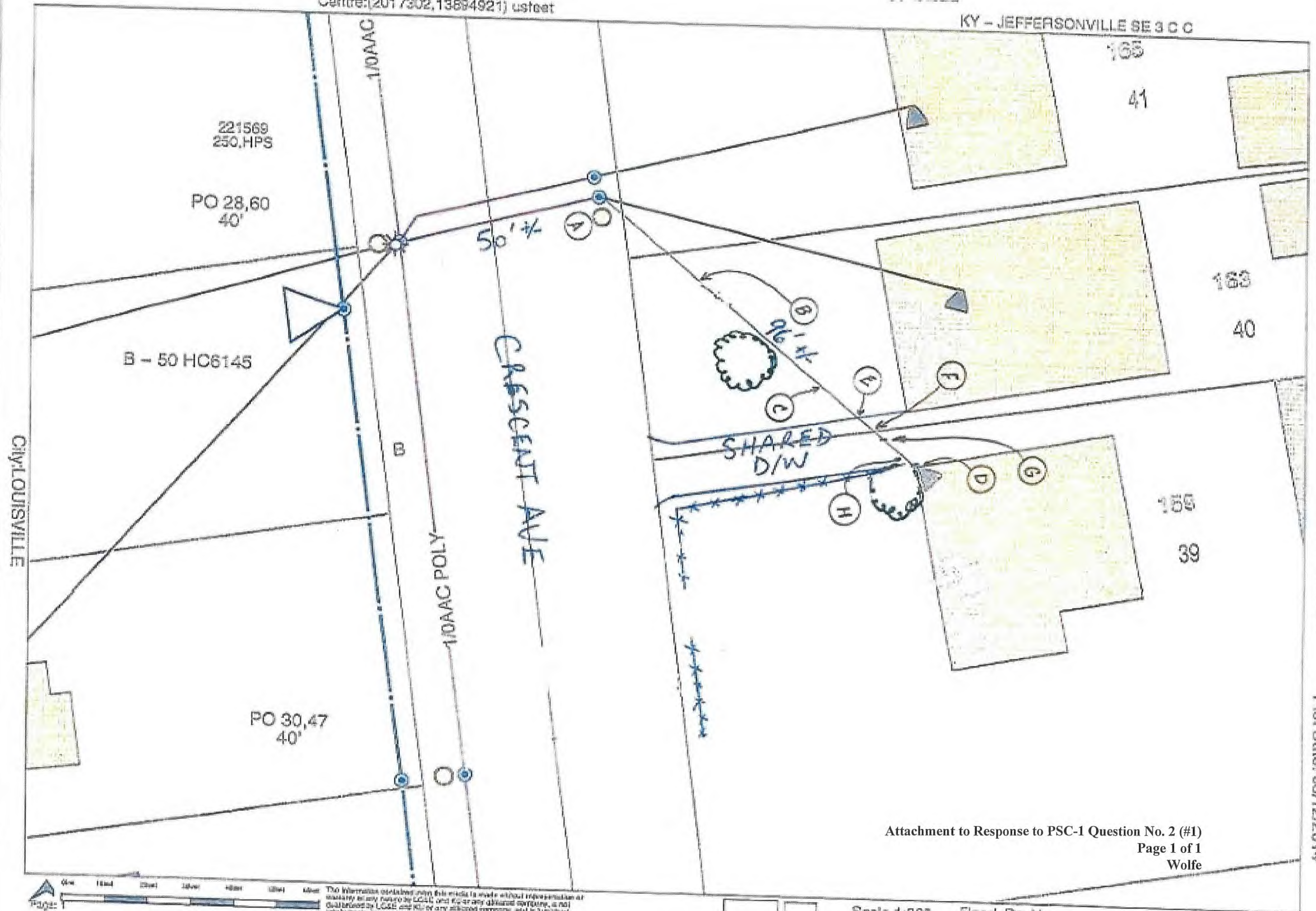
**Response to
Commission Staff's First Request for Information
and Production of Documents
Dated August 14, 2014**

Case No. 2014-00198

Question No. 2

Witness: John K. Wolfe

- Q-2. Provide drawings showing horizontal and vertical views of the overhead service wire, to include:
- a. The service pole at or near 163 Crescent Avenue, Louisville, Kentucky, where service wire at issue originates;
 - b. The service wire as it crosses over the front yard at 163 Crescent Avenue, Louisville, Kentucky to neighbor's home; and
 - c. The connection to the neighbor's home where service wire enters the neighbor's home.
- A-2. See attached drawing and photograph with embedded notations.



PRICE: \$ 2000 Description: This is a site plan for the proposed development of a residential subdivision in Jeffersonville, Kentucky. The site is located on the east side of Casscent Avenue, between Louisville and Jeffersonville. The site is bounded by Louisville to the west, Jeffersonville to the east, and Casscent Avenue to the south. The site is divided into several lots, each of which is shown with its proposed building footprint. The building footprints are shown in yellow. The site plan also shows the proposed utility lines, including water, sewer, and gas. The site plan is drawn to scale and includes a north arrow. The site plan is subject to the approval of the Jeffersonville Planning Commission and the Jeffersonville City Council.

Town: Louisville

Plot Date: 06/12/2014

Attachment to Response to PSC-1 Question No. 2 (#1)
Page 1 of 1
Wolfe



This information contains only this data is made without interpretation or warranty in any manner by L&L, and for any other use, is not authorized by L&L and any other person, and is confidential.



LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to
Commission Staff's First Request for Information
and Production of Documents
Dated August 14, 2014**

Case No. 2014-00198

Question No. 3

Witness: John K. Wolfe

- Q-3. Referring to Paragraph 2(a) of LG&E's Answer, was a new service pole installed when LG&E raised the service wire to the neighbor's house on July 25, 2014?
- A-3. No, a new service pole was not necessary. The service wire was raised by re-sagging the wire on the existing pole.

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to
Commission Staff's First Request for Information
and Production of Documents
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Case No. 2014-00198

Question No. 4

Witness: John K. Wolfe

- Q-4. Referring to Paragraph 2(a) of LG&E's Answer, what is the current attachment height of the overhead service wire at issue in this matter at the service pole located at or near 163 Crescent Avenue, Louisville, Kentucky?
- A-4. The current attachment height of the overhead service wire at issue at the service pole is thirty feet, ten inches (30'10").

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to
Commission Staff's First Request for Information
and Production of Documents
Dated August 14, 2014**

Case No. 2014-00198

Question No. 5

Witness: John K. Wolfe

- Q-5. Referring to Paragraph 2(a) of LG&E's Answer, what is the current overhead clearance, at the lowest point, of the overhead service wire at issue in this matter as it crosses over the residential property located at 163 Crescent Avenue, Louisville, Kentucky?
- A-5. The current overhead clearance, at the lowest point, of the overhead service wire at issue over the residential property located at 163 Crescent Avenue is fourteen feet, four inches (14'4").

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to
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Case No. 2014-00198

Question No. 6

Witness: John K. Wolfe

- Q-6. Referring to Paragraph 2(a) of LG&E's Answer, what is the current overhead clearance, at the lowest point, of the overhead service wire at issue in this matter as it crosses over the driveway attached to the residential property located at 163 Crescent Avenue, Louisville, Kentucky?
- A-6. The current overhead clearance, at the lowest point, of the overhead service wire at issue as it crosses over the driveway between the residential properties located at 159 Crescent Avenue and 163 Crescent Avenue is fourteen feet, one inch (14'1").

LOUISVILLE GAS AND ELECTRIC COMPANY

**Response to
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Case No. 2014-00198

Question No. 7

Witness: John K. Wolfe

- Q-7. Referring to Paragraph 2(a) of LG&E's Answer, what is the current overhead clearance of the overhead service wire at issue in this matter at Tracy Mathis's neighbor's service entrance?
- A-7. The current overhead clearance of the overhead service wire at issue at the neighbor's service connection point is fourteen feet (14'0").

LOUISVILLE GAS AND ELECTRIC COMPANY

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Case No. 2014-00198

Question No. 8

Witness: John K. Wolfe

- Q-8. On what date was the overhead service drop, at issue in this matter, installed to furnish service to the home neighboring 163 Crescent Avenue, Louisville, Kentucky?
- A-8. The neighboring home, 159 Crescent Avenue, Louisville, Kentucky, was constructed in 1921 according to Jefferson County Property Valuation Administration records. LG&E believes electric service to the home would have been installed at the time of construction.

The service pole to 163 Crescent Avenue, Louisville, Kentucky was moved in 1994 from the right side of the property to the left side of the property at the request of the then existing customer.