

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CHRIS WISEMAN	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2009-00026
DUKE ENERGY KENTUCKY, INC.	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S DATA REQUEST  
TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke Kentucky"), pursuant to 807 KAR 5:001, is to file with the Commission the original and four copies of the following information, with a copy to all parties of record. The information requested herein is due on or before March 30, 2009. Responses to requests for information shall be appropriately bound, tabbed and indexed. 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 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.

Duke Kentucky 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 Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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.

1. How long has Complainant, Chris Wiseman, had the account at the 32 Avenel Place address?

2. Refer to Paragraph 3 of the answer of Duke Kentucky filed on January 30, 2009. Explain how Complainant's bill was calculated from June 2007–June 2008, when Duke Kentucky states that it was unable to access and read the meter. Provide all calculations and work papers associated with the estimation process.

3. Refer to Paragraph 1 of the answer of Duke Kentucky filed on January 30, 2009.

a. The second sentence of the paragraph states that Duke Kentucky repaired the leak on Complainant's meter on January 18, 2008. Describe when and how Duke Kentucky became aware that the meter had a gas leak.

b. Paragraph 3 states that Duke Kentucky was unable to access Complainant's meter from June 2007 through June 2008. Explain how Duke Kentucky was able to access and repair the meter in January 2008 but was not able to access and read the meter for the 12-month period cited in the first sentence of this request.

c. The last sentence in Paragraph 1 states that the leak had little to no effect on the amount of gas registered. Explain how Duke Kentucky knows this to be true.


4. Paragraph 4 of Duke Kentucky's January 30, 2009 answer states that, beginning in July 2007, Complainant's bills included an "Urgent Message" informing him that his bills were estimated and requesting that he make arrangements for an actual meter reading.

a. Provide copies of all of Complainant's bills which included this message and the bill which included the consumption adjustment made after the July 2008 meter reading.

b. Given the existence of the burglar alarm that prevented Duke Kentucky from accessing Complainant's meter for roughly 12 months, explain how Duke Kentucky was able to access the meter in July 2008 and obtain an actual meter reading.

c. During this one-year time frame, did Duke Kentucky attempt to contact the customer in any other manner to make arrangements for a meter reading? If not, explain why not.

5. Describe the extent, if any, to which Duke Kentucky has offered Complainant an extended period of time in which to pay his bill.



---

Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED: MARCH 16, 2009

cc: Parties of Record

Case No. 2009-00026

Rocco O D'Ascenzo  
Duke Energy Kentucky, Inc.  
P. O. Box 960  
139 East 4th Street  
Cincinnati, OH 45201

Chris Wiseman  
32 Avenel Pl  
Ft. Thomas, KY 41075