

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CHARLES S. CARTER JR.)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2010-00129
)	
KENTUCKY UTILITIES COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST TO
KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company ("KU") is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than September 1, 2010. 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.

KU 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 KU 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.

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. Refer to Exhibit A to KU's April 22, 2010 Answer, which shows that the electric meter at Complainant's home was tested on April 14, 2010. Refer also to Complainant's statement at page 4 of his June 22, 2010 Response (an e-mail dated April 30, 2010 from Complainant to the Director of the Commission's Consumer Services Division) in which he states:

KU changed the electric meter after I complained about my bill doubling from 1510 KWH in December to 3135 KWH in January. I also reported that the meter was giving irregular readings. I at no time requested that the meter be changed or checked. I was also informed that there would be no charge on my part for this service. KU reported in the report that the meter tested within normal limits and they were going to charge me for the test. If this is true why did my bill for April, return to a normal reading of 1597 KWH after the meter was changed?

a. Explain in detail whether KU installed a different meter at Complainant's residence after KU became aware that Complainant was disputing his electric bill.

b. If a different meter was installed at Complainant's residence, why was the original meter replaced?

2. Refer to KU's April 22, 2010 Answer at page 3, in which KU states that the winter of 2009-2010 was "unusually cold."

a. Provide any temperature and weather condition records maintained by KU for the Corbin, Kentucky area for the months of November 2009, December 2009, January 2010, February 2010, March 2010, and April 2010.

b. Provide the source for the temperature and weather data provided in response to Item 2a above and discuss in detail the methodologies employed by KU to ensure the accuracy and reliability of such data.

3. Provide copies of all of Complainant's electric utility bills from April 2007 through April 2010.

4. Refer to the attachment to KU's August 2, 2010 Reply labeled "Kwh Usage Data July 11, 2006 – March 6, 2009." Provide a revised version of the August 2, 2010 attachment showing Complainant's kilowatt usage data from July 11, 2006 to April 30, 2010.

DATED: AUG 19 2010

cc: Parties of Record



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