

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

STEVE N. NICHOLS)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2012-00218
)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO STEVE N. NICHOLS

Steve N. Nichols ("Complainant"), pursuant to 807 KAR 5:001, 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 14 days from the date of issuance of this request. 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 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.

Complainant shall make timely amendment to any prior response if he 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 Complainant fails or refuses to furnish all or part of the requested information, he shall provide a written explanation of the specific grounds for the 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.

1. Refer to page 2 of 2 of the Complaint where it states “that these amounts be removed from my home account . . . and be marked as paid since they are so old and I have had balances on these addresses since then.”

a. Fully explain why these balances should be removed from Complainant’s home account.

b. Does Complainant agree that the amounts indicated for the accounts listed in the Complaint have not been paid and are outstanding?

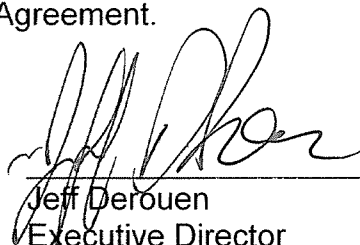
c. If no, provide documentation that the amounts in question for the listed accounts have been paid.

2. Refer to paragraph 3, page 2, of Louisville Gas and Electric’s (“LG&E”) Answer filed July 2, 2012.

a. Explain whether Complainant agrees that he is the Landlord/ Property Owner of the properties listed and that the amounts transferred to

Complainant's home account are for service incurred at the listed addresses for the dates indicated.

b. Explain whether Complainant agrees that there was and is an Owner Allocation Agreement with LG&E that was in effect for the time periods covered by the outstanding billings identified in the Complaint and that, pursuant to the terms of that Owner Allocation Agreement, Complainant is responsible for service to these properties according to the Owner Allocation Agreement.



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

DATED AUG 20 2012

cc: Parties of Record

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VP - State Regulation an
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