

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	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO TRACY MATHIS

Tracy Mathis ("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 no later than 14 days after the date of this request. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness who will be 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.

Complainant shall make timely amendment to any prior response if she 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, she shall provide a written explanation of the specific grounds for her 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.

1. Set forth in specific detail the reasons why you believe that the service wire at issue in this case presents an unsafe condition.

2. State whether you believe that if the service wire at issue in this case were raised it would no longer present an unsafe condition. If the answer is in the affirmative, how high do you believe the service wire must be to no longer present an unsafe condition?

3. On September 22, 2014, Louisville Gas and Electric Company ("LG&E") filed a copy of the National Electrical Safety Code ("NESC") in effect in 1994 when the service wire at issue was installed. According to the NESC then in effect, the service wire at issue is not in violation of the minimum vertical clearance. Do you dispute the copy of the NESC filed by LG&E on September 22, 2014?

a. If so, explain the reasons why you believe the service wire at issue is in violation of the minimum vertical clearance required by the NESC, and also explain the corrective actions that you want LG&E to take.

b. If not, explain what corrective action will satisfy your complaint that there are safety hazards.

4. Set forth in specific detail what resolution will satisfy your complaint regarding alleged safety hazards arising from the service wire which crosses your property, in light of the fact that LG&E's Tariff Sheet No. 97.3 grants LG&E the right to cross one customer's premises to provide electric service to a neighboring premises in a reasonable manner. A copy of LG&E Tariff Sheet No. 97.3 is attached.



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

DATED OCT 06 2014

cc: Parties of Record

# Louisville Gas and Electric Company

P.S.C. Electric No. 9, First Revision of Original Sheet No. 97.3  
Canceling P.S.C. Electric No. 9, Original Sheet No. 97.3

## TERMS AND CONDITIONS

### Customer Responsibilities

#### PERMITS

Customer shall obtain or cause to be obtained all permits, easements, or certificates, except street permits, necessary to give Company or its agents access to Customer's premises and equipment and to enable its service to be connected therewith. In case Customer is not the owner of the premises or of intervening property between the premises and Company's distribution lines, Customer shall obtain from the property owner or owners the necessary consent to the installation and maintenance in said premises and in or about such intervening property of all such wiring or other customer-owned electrical equipment as may be necessary or convenient for the supply of electric service to customer. Provided, however, to the extent permits, easements, or certificates are necessary for the installation and maintenance of Company-owned facilities, Company shall obtain the aforementioned consent.

The construction of electric facilities to provide service to a number of customers in a manner consistent with good engineering practice and the least public inconvenience sometimes requires that certain wires, guys, poles, or other appurtenances on a customer's premises be used to supply service to neighboring customers. Accordingly, each customer taking Company's electric service shall grant to Company such rights on or across his or her premises as may be necessary to furnish service to neighboring premises, such rights to be exercised by Company in a reasonable manner and with due regard for the convenience of the customer.

Company shall make or cause to be made application for any necessary street permits, and shall not be required to supply service under Customer's application until a reasonable time after such permits are granted.

**DATE OF ISSUE:** January 31, 2013

**DATE EFFECTIVE:** August 1, 2010

**ISSUED BY:** /s/ Lonnie E. Bellar, Vice President  
State Regulation and Rates  
Louisville, Kentucky

Issued by Authority of an Order of the  
Public Service Commission in Case No.  
2009-00549 dated July 30, 2010

KENTUCKY PUBLIC SERVICE COMMISSION
JEFF R. DEROUEN EXECUTIVE DIRECTOR
TARIFF BRANCH  <i>Brent Kirtley</i>
EFFECTIVE <b>1/4/2013</b> PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

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