

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 SECOND REQUEST FOR INFORMATION
AND PRODUCTION OF DOCUMENTS
TO LOUISVILLE GAS AND ELECTRIC COMPANY


Louisville Gas and Electric Company ("LG&E" or "Defendant"), 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 December 1, 2014. 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.

Defendant 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 Defendant fails or refuses to furnish all or part of the requested information, Defendant 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.

1. Refer to Complainant's response to Staff's Initial Request for Information, Item 1, asserting that the service wire at issue had "fallen in the yard before." Provide all reports, service calls, and related documents pertaining to any downed utility lines at the property located at 163 Crescent Avenue, Louisville, Kentucky, which have occurred since 1994, when the service pole was moved to its current location on the left side of the property.



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

DATED NOV 10 2014

cc: Parties of Record

Case No. 2014-00198

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