

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the matter of:

ROY GAINES WALTON
GERALD WALTON, Et Al
COMPLAINANTS

V.

KENTUCKY UTILITIES COMPANY
DEFENDANT

)
)
)
)
) NO. ~~2005-00136~~ and
) NO.s 2004-00450; 2005-
) 00099; 2004-00497; 2004-
) 00499; 2005-00118; 2005-
) 00137; and 2005-00182
)
)
)

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Come the Complainants, Roy Gaines Walton and Gerald Walton, by counsel and for their First Set of Interrogatories and Requests for Production of Documents, respectively state as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Please state the name of all individuals contributing to the answers to these discovery requests, including said individual's address, telephone number, and relationship to the Defendant.

INTERROGATORY NO. 2: Please identify each person whom you expect to call as an expert witness in this matter, including the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion.

INTERROGATORY NO. 3: Please identify the name, address, phone number and position of all KU employees that spoke with Plaintiff's regarding this matter, as well as the dates and substance of the conversations.

INTERROGATORY NO. 4: Please identify the name, address and telephone number of the KU investigator(s) involved in this matter, dates of action and all accompanying documents, records or reports.

INTERROGATORY NO. 5: Please state the name, address and telephone number of each individual likely to have discoverable information related to the events described in the Complaint.

INTERROGATORY NO. 6: Please identify the tariff relied upon in this matter; effective date; specific amendments to the tariff; and effective date of amendments.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Please provide a copy of the tariff(s) that the Defendant is relying upon in regard to this matter, including any amended tariff(s).

REQUEST NO. 2: Please provide the reasons for the tariff(s) and any accompanying justification.

REQUEST NO. 3: Please provide the Complainant's account information regarding the subject address of 832 Ward Drive. Please provide the information in a format that includes, by date, the amount owed, the amount billed, and any payments made.

REQUEST NO. 4: Please provide a copy of any correspondence from the Defendant to Complainants in relation to this matter.

REQUEST NO. 5: Please provide any company charges and payments in regard to 836 Ward Drive during the time period of December 2004 through April 2005.

REQUEST NO. 6: Please provide any additional documentation or account information that the Defendant is relying upon in relation to this matter.

REQUEST NO. 7: Please provide all reports, documents, work orders, and correspondence related to 832 Ward Drive between the dates of September 2004 and February 2006.

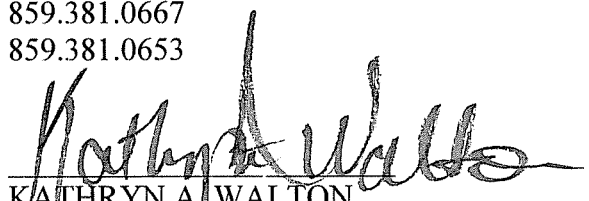
REQUEST NO. 8: Please identify and explain the mechanism and process that KU relies upon to monitor usage of its product.

REQUEST NO. 9: Please provide all computer and phone data generated in relation to the account of Mr. Roy Gaines Walton and the property located at 832 Ward Drive, Lexington, Kentucky for the time period September 2004 through February 2006

Respectfully submitted,

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BY:


KATHRYN A. WALTON
ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was sent by mail, postage prepaid, on April 11, 2006 to:

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