



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 involved in this matter, dates of action and any 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.

#### **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.

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 November 2004 and April 2005.

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

Respectfully submitted,

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BY:

  
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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

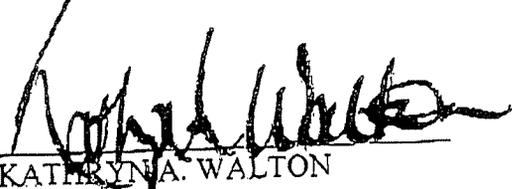
This is to certify that a copy of the foregoing was sent by mail, postage prepaid, on September 23, 2005 to:  
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Manager, Regulatory Affairs  
Kentucky Utilities Company  
c/o Louisville Gas & Electric Co.  
P.O. Box 32010  
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