

November 14, 2005

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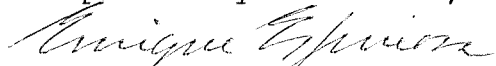
Elizabeth O'Donnell
Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, Kentucky 40602

RE: Case No. 2005-00398, Enrique Espinosa v. Louisville Gas and Electric Company.

Dear Ms. O'Donnell:

Enclosed please find an original and four (4) copies of my answers to "FIRST DATA REQUEST OF COMMISSION STAFF TO ENRIQUE ESPINOSA".

Respectfully submitted,


Enrique Espinosa

cc: Ms. Elizabeth L. Cocanougher

ANSWERS TO FIRST DATA REQUEST OF COMMISSION STAFF TO ENRIQUE ESPINOSA

1. a. State the approximate dates you left and returned to your Orion home.

After acquiring on December 19, 2003 my second residence-farm (13702 East Rehl Ct., Louisville, KY 40299) which is located about 12 miles from my Orion home, I spent about 60 % of my time during the months of April thru December 2004 and January thru the current month of November 2005 at this residence. I estimate having spent about 25 % of my time at my Orion home. I drove almost daily to Orion to check the house, get my mail, check my phone calls and take care of chores. I stayed variable amounts of time, sometimes spending the night. Witness (Wt): Enrique Espinosa (EE).

- b. What type of thermostat do you have? Is it new or old and does it have variable settings?

The thermostat type is an old General Electric with variable manual settings dial to temperatures between 55°F thru 95 °F., and switch settings for cool and heat, on or off, and switch for fan on or auto. The equipment was in the home when I purchased it in 1988 and it is in good working order. Wt: EE.

- c. At what temperature did you set your thermostat?

In order to conserve energy, when the outside temperature was between 40 and 35°F and I was away from my Orion home I set the thermostat at the lowest 55°F setting. When I stayed at this residence, I set it at 60°F. During warmer weather I kept the thermostat off and also I turned the furnace pilot off. Wt: EE.

- d. Was a member of your family or anyone else living in the house during this period of time?

During this period of time nobody but myself was living in the house. WT: EE.

- e. During this period of time, did you or anyone else apply paint to the gas meter? If yes, explain.

No. The paint on the gas meter is the original factory paint. Wt: EE.

2. During this period of time, were any physical changes made to your Orion home, such as added rooms or change in your furnace or windows?

The only changes regard the annual Winterization, as recommended by LG&E, and or good sense dictates. Prior to Winter I check for cracks around doors, window frames and electric outlets sealing with caulk or other sealants sites where wind and air can get inside. Windows of unoccupied rooms were additionally insulated with heavy drapes. The furnace was serviced with particular attention to the good condition and working order of the heat exchanger, pilot light, venting exhaust pipe and filters. Wt. EE.

3. Name the appliances inside or outside of your home that operate on natural gas.

Inside my home there are G.E. natural gas operated heating furnace and Reliance 40 gal. water heater. There are no outside gas appliances. Wt: EE.

4. Were any of those natural gas appliances changed or replaced during this period of time?

Those appliances were not changed or replaced during this period of time. Wt: EE.

5. Do you use part of your home to conduct any type of business?

No. I do not use part of my home to conduct any type of business. Wt: EE.

6. When did you respond to LG&E's request to provide access to the meter reader to read your gas meter? Explain in detail.

I responded on January 25 to LG&E's request of letter dated January 21. I called the LG&E's office saying I was agreeable to leave my driveway gate open on meter reading dates so that the meter readers could drive their vehicles closer to the meters. To explain this issue in detail, the following background information is necessary.

a. I was not aware LG&E was making estimated readings in my Orion home till I received the LG&E letter of January 21. I had been simply paying the bills without reading the complex information including reading meter data printed in small characters on the front and back of the bills.

b. I did not have knowledge till January 25 LG&E needed my driveway gate open to have access to the meters, as claimed by LG&E, in view of the fact that other access has always been available as indicated below.

c. The electric and gas meters are located outside the house at about 200 feet from the road and 50 feet from the LG&E utility electric lines easement located on the back of the property. This easement and meters are accessible to LG&E at all times. As a matter of fact, LG&E personnel or contractors often walk thru my property and that of my neighbors to repair lines, trim trees or read meters, while parking their vehicles on the road. For example, on March 31 and September 30, dates when LG&E claims to have changed the glass on the meter and check the index, my driveway gate was closed since these were not meter-reading dates. While absent, I leave my gate closed for security reasons, to avoid the entry of unauthorized vehicles. However, individuals may walk thru the property as indicated above. I understand it is more convenient to the meter readers to enter my property with their vehicles to read the meters and therefore I will continue leaving the gate open on meter reading dates. Wt: EE.