LaJuana S. Wilcher, Secretary Environmental and Public Protection Cabinet

Christopher L. Lilly Commissioner Department of Public Protection

Kent Blake
Director- State Regulation and Rates
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010



Commonwealth of Kentucky
Public Service Commission

211 Sower Blvd. P.O. Box 615 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov

September 21, 2006

Mark David Goss Chairman

> Teresa J. Hill Vice Chairman

RE: Case No. 2006-00385

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact Linda Mattox at (502) 564-3940 ext. 407.

Sincerely,

Beth O'Donnell Executive Director

BOD/jc Enclosure



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September 21, 2006

Lawrence W. Cook
Assistant Attorney General
Office of the Attorney General Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601-8204

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Mark David Goss

Chairman

Teresa J. Hill

Vice Chairman

LaJuana S. Wilcher, Secretary Environmental and Public Protection Cabinet

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John McKeehan 2907 Arlington Road Louisville, KY 40220-1311



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Christopher L. Lilly Commissioner Department of Public Protection

Honorable Allyson K. Sturgeon Attorney at Law E.ON U.S., LLC 220 West Main Street Louisville, KY 40202



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Kent Blake Director- State Regulation and Rates Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

Honorable Allyson K Sturgeon Attorney at Law E.ON U.S., LLC 220 West Main Street Louisville, KY 40202 Lawrence W. Cook Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204 John McKeehan 2907 Arlington Road Louisville, KY 40220-1311

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	
JOHN McKEEHAN)
COMPLAINANT)
V.) CASE NO. 2006-00385
LOUISVILLE GAS AND ELECTRIC COMPANY))

DEFENDANT

COMMISSION STAFF'S FIRST DATA REQUEST TO LOUISVILLE GAS AND ELECTRIC COMPANY

Pursuant to 807 KAR 5:001, Commission Staff requests that Louisville Gas and Electric Company ("LG&E") file the original and 6 copies of the following information within 20 days of the date of this request, with a copy to each party of record. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure is legibility.

1. Provide copies of the monthly bills for the addresses listed below for the dates requested. Additionally, provide a detailed analysis of the monthly usage and payment history for each address for the dates listed. The analysis should include the monthly usage for gas and electric listed separately, any other charges separately

identified, and the application of payments to the appropriate account. Indicate the billing and mailing address for each account.

- a. 319 M Street, Apartment 1F, account number 8000215825002, from April 1, 1996 to February 20, 1997.
- b. 319 M Street, Apartment 2F, account number 8000215825003,from April 1, 1996 to June 2, 1997.
- c. 4105 Southern Parkway, account number 8000215825004, from June 19, 1997 to December 17, 1997.
- 2. Describe the collection efforts made by LG&E before and after the date of the bankruptcy.
- 3. Provide all correspondence, internal memoranda, electronic mail messages, and other internal documents from April 1996 until the present, in which electric and/or gas service to John or Shannon McKeehan is discussed.
- 4. Provide the most recent dates of gas and electric service to 319 M Street, Apartment 1F; 319 M Street, Apartment 2F; and 4105 Southern Parkway.
- 5. Does LG&E have a gas or electric meter located at 319 M Street? If no, provide the date the meter(s) was removed.
- 6. Provide a copy of any documentation, such as a wrecking permit, pertaining to the demolition of the building at 319 M Street.
- 7. In its answer to the complaint at page 3, LG&E states that the service at the current address was disconnected for nonpayment. Provide a payment history for the service at the current address from the time the service was connected until the present.

8. 807 KAR 5:006, Section 12(1), states that, if a termination-of-service request is made by telephone, the burden of proof is on the customer to prove that service termination was requested if a dispute arises.

a. Provide the type of proof that LG&E has accepted in the past to determine if a customer requested termination by telephone.

b. Describe the other methods a customer can use to request

termination of service.

Beth O Donnell

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: September 21, 2006

cc: Parties of Record

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the	Matter of:		
	JOHN McKEEHAN)	
	COMPLAINANT)	
	V.)	CASE NO. 2006-00385
	LOUISVILLE GAS AND ELECTRIC COMPANY)	
	DEFENDANT)	

COMMISSION STAFF'S FIRST DATA REQUEST TO JOHN McKEEHAN

Pursuant to 807 KAR 5:001, Commission Staff requests that John McKeehan file the original and 6 copies of the following information within 20 days of the date of this request, with a copy to each party of record. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure is legibility.

1. Provide a copy of any available documentation, such as a wrecking permit or condemnation notice, pertaining to the demolition of the building at 319 M Street. If no documentation exists, provide the date of the building demolition.

2. In your formal complaint, you state that "On Monday, June 3, 1996, I called LG&E...." Explain how you recall the specific day and date. Provide any

available notes or records to support that date.

3. In reference to the outstanding balance at 4105 Southern Parkway from

June 19, 1997 through December 17, 1997, provide the following information.

a. Do you dispute that outstanding balance?

b. If yes, explain why you are not responsible for the outstanding

balance.

4. Do you have any police reports or other type of documentation about the

homeless people who were gaining entrance into the property? If yes, provide copies.

Beth O'Donnell-

Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED: September 21, 2006

cc: Parties of Record