

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MARK THURSTON)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2007-00384
)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

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

Louisville Gas and Electric Company ("LG&E") is requested, pursuant to 807 KAR 5:001, to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on October 26, 2007. Each copy of the data requested should be placed in a bound volume with each item tabbed. Responses to requests for information shall be appropriately indexed, for example, Item 1(a), Sheet 2 of 6, and shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, shall 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.

LG&E shall make timely amendment to any prior response if it obtains information upon the basis of which it knows that the response was incorrect when made, or though correct when made, is now incorrect in any material respect. For any request to which LG&E fails to furnish all or part of the requested information, LG&E shall provide a written explanation of the specific grounds for its failure to furnish.

Careful attention shall be given to copied material to ensure its legibility. 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. Provide copies of any and all correspondence between Mark Thurston and LG&E relating to the billing issues at 8919 Reinhart Way ("Reinhart Way") and 2804 Hikes Lane ("Hikes Lane"), Louisville, Kentucky.

2. Provide copies of any and all audio recordings of telephone conversations between Mr. Thurston and representatives of LG&E's Customer Commitment Department relating to the billing issues at Reinhart Way and Hikes Lane, Louisville, Kentucky.

3. Provide all actual readings of Mr. Thurston's gas and electric meters at his Reinhart Way residence from July 1, 2005 to March 19, 2007.

4. Provide all actual readings of Mr. Thurston's gas and electric meters at his Hikes Lane residence from October 23, 2006 to the present.

5. Provide the relevant gas and electric meter numbers and account numbers with respect to the property at Reinhart Way.

6. Provide the relevant gas and electric meter numbers and account numbers with respect to the property at Hikes Lane.

7. Provide copies of any and all service records indicating problems with the gas meter and/or electric meter for the property at Reinhart Way from July 1, 2005 through March 19, 2007.

8. Provide copies of any and all service records indicating problems with the gas meter and/or electric meter for the property at Hikes Lane from October 23, 2006 to the present.

9. Provide any and all documentation outlining the previous test history of the gas and electric meters for the property at Reinhart Way and furnish the results of those tests.

10. Provide any and all documentation outlining the previous test history of the gas and electric meters for the property at Hikes Lane and furnish the results of those tests.

11. Refer to LG&E's September 17, 2007 response, pages 3 and 4, Hikes Lane Section.

a. Explain how Mr. Thurston's electric meter, which did not show any usage for four consecutive readings, could later be tested and found to be operating within acceptable regulatory limits. Does that mean that there was in fact no usage of electricity occurring?

b. Describe what is meant by a stopped electric meter.

c. Describe the nature of the offsetting credits in the amounts of \$12.94 and \$30.00 applied to Mr. Thurston's February 2007 and March 2007 bills, respectively.

12. Refer to page 3 of LG&E's answer to the complaint, Section "First Affirmative Defense," Subsection Hikes Lane. What is the standard procedure when a live meter reading shows no electric usage? Provide documentation.

13. Refer to page 3 of LG&E's answer to the complaint, Section "First Affirmative Defense," Subsection Hikes Lane. Provide documentation of attempts to contact Mr. Thurston to discuss his electric usage at the Hikes Lane address.

14. Provide copies of the bills from July 1, 2005 through March 19, 2007 that LG&E sent to Mr. Thurston at his Reinhart Way address.

15. Provide copies of the bills from October 23, 2006 to the present that LG&E sent to Mr. Thurston at his Hikes Lane address.

16. Did bills for Reinhart Way continue to be addressed to that mailing address after October 2006? If not, state the address to which the Reinhart Way bills were mailed.

17. Provide a copy of bills for Reinhart Way and for Hikes Lane from October 2006 through present.

18. Refer to page 2, paragraph (c), of LG&E's answer to the complaint. Explain the discrepancy between the stated 140 days of electric service associated with the \$351.42 bill and the stated dates from October 5, 2006 through January 29, 2007, only 116 days.

19. Refer to page 2, paragraph (c), of LG&E's answer to the complaint. Why were only 29 days of gas service provided to the Hikes Lane address?

20. Refer to page 3 of LG&E's answer to the complaint, Section "First Affirmative Defense," Subsection Hikes Lane. Was any investigation conducted as to possible tampering with the electric meter at the Hikes Lane address?



Beth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: October 10, 2007

cc: Parties of Record