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COMMISSION

Mr. Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

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State Regulation and Rates
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December 20, 2010

RE: CHARLES S. CARTER JR. V. KENTUCKY UTILITIES COMPANY
DEFENDANT
CASE NO. 2010-00129

Dear Mr. DeRouen:

Enclosed please find an original and ten (10) copies of Kentucky Utilities Company's Response to the Commission Staff's Second data request dated December 10, 2010, in the above-referenced matter.

A copy is being mailed to the Complainant.

Please contact me if you have any questions concerning this filing.

Sincerely,

Rick E. Lovekamp
Rick E. Lovekamp *MR*

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

CHARLES S. CARTER JR.
COMPLAINANT

V.

KENTUCKY UTILITIES COMPANY
DEFENDANT

)
) CASE NO.
) 2010-00129
)
)

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S SECOND DATA REQUEST
DATED DECEMBER 10, 2010

FILED: December 20, 2010

KENTUCKY UTILITIES COMPANY

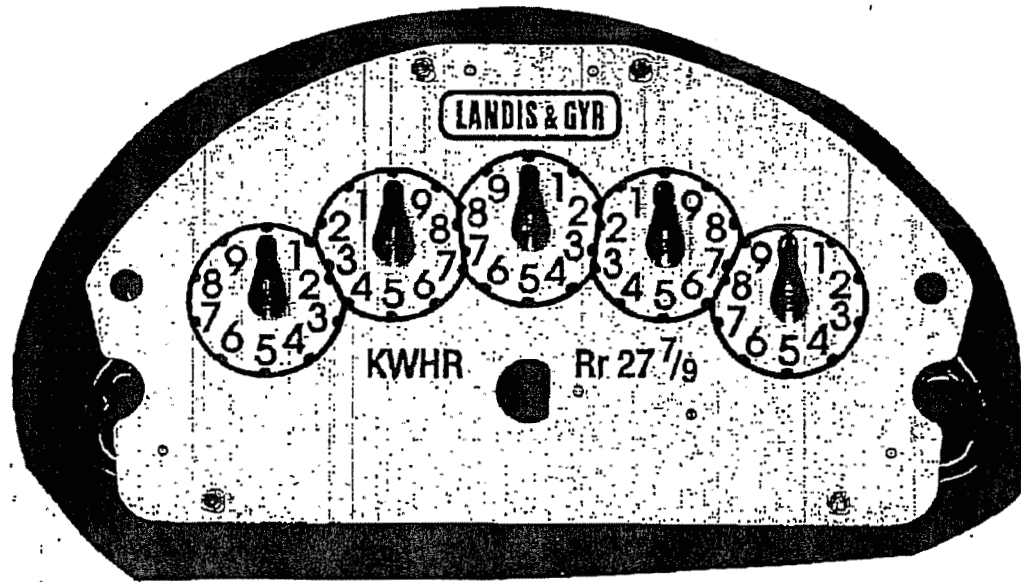
**Response to Commission Staff's Second Data Request
Dated December 10, 2010**

Case No. 2010-00129

Question No. 1

Witness: Scott Cooke, Manager, Meter Design Strategy & Operations

- Q-1. In response to Commission Staff's First information Request, Item 3, KU attached copies of Complainant's electric bills from September 19, 2008 through August 18, 2010. KU's Attachment to Question No. 3, page 39 of 48, identifies Meter #C457745 as the meter which was installed at Complainant's residence in April 2010.
- a. Describe Meter #C457745 by manufacturer and model name and whether it is an electronic meter or an electromechanical meter.
 - b. Describe whether Meter #C457745 has an analog display or a digital display.
 - c. If Meter #C457745 has an analog display, in what direction do each of the meter dials turn? (Explain the dial sequence from the dial on the left side of the meter face to the dial on the right side of the meter face.)
 - d. Explain the method for reading Meter #C457745 in order to accurately record electric usage at the residence from one day to the next.
- A-1.
- a. Meter number C457745 was manufactured by Landis + Gyr. It is a model MX and is an electromechanical meter.
 - b. Meter number C457745 has an analog register, with five dials.
 - c. The dial rotation sequence for meter number C457745, beginning with the left dial, is clockwise, counter-clockwise, clockwise, counter-clockwise, and clockwise. Adjacent dials rotate in opposite directions and are geared so that the pointer on the right will make one complete revolution while the one next to it on the left makes one-tenth of a revolution. See photocopy below of a five dial, Landis + Gyr, MX register.



- d. According to the ninth edition of the Handbook for Electricity Metering, a watt hour meter is read from right to left by reading all the dials and recording the reading in the same sequence. Each pointer must complete a revolution to advance the pointer located at its left by one division. Therefore, in deciding upon the reading of a pointer, the pointer before it (to the right) must be consulted. Unless this pointer has reached or passed zero, which is one complete revolution, the pointer in question has not completed the division on which it may appear to rest. For this reason, accuracy and rapidity are gained by reading the meter from right to left.

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's Second Data Request
Dated December 10, 2010**

Case No. 2010-00129

Question No. 2

Witness: Scott Cooke, Manager, Meter Design Strategy & Operations

Q-2. In his October 7, 2010 letter, Complainant states:

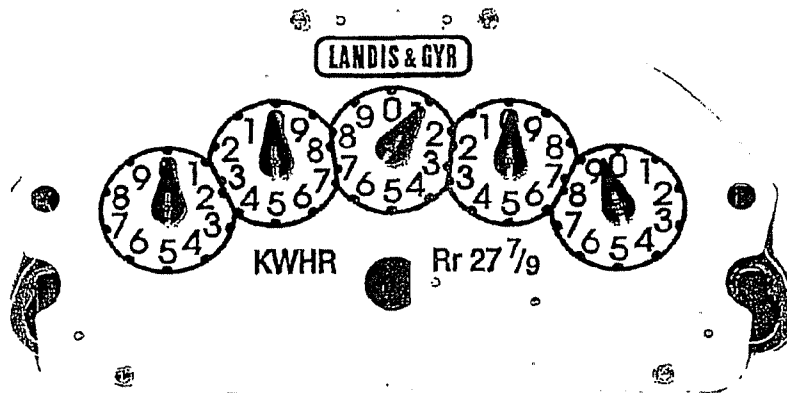
“I have been recording my KWH readings on my third meter daily between 12:00 PM and 1:00 PM each day and I have recorded some very strange readings. On 7/23/2010 the KWH reading was 09147 however the next day the reading was 09121 which was 26 KWH less than the day before? On 7/28/2010 the KWH reading was 09584 however the next day the reading was 09567 which was 17 KWH less than the day before? On 9/16/2010 the KWH was 13295 however the reading the next day was 13261 which was 34 KWH less?”

What would account for Complainant's meter reading on July 24, 2010 being 26 kWh less than the reading on July 23, 2010, the meter reading on July 29, 2010 being 17 kWh less than the reading on July 28, 2010, and his meter reading on September 17, 2010 being 34 kWh less than the reading on September 16, 2010?

A-2. The inconsistency and perceived inaccurate registration is likely due to a misread on July 23, 2010, July 28, 2010, and September 16, 2010 by the Complainant.

Based on KU's meter reading records, from July 6, 2010 through October 5, 2010 the Complainant's average usage per day was 73.6 kWh. Comparing the per day average kWh to the Complainant's readings indicate that the day one readings are too high, which create the negative consumption.

The following is a photocopy of a Landis + Gyr, MX register, similar to the register on the Complainant's meter.



To the untrained reader, the register may appear to read 00109 kWh. However, the correct reading is 00099 kWh.