



a PPL company

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

RECEIVED

FEB 14 2011

PUBLIC SERVICE
COMMISSION

Kentucky Utilities Company
State Regulation and Rates
220 West Main Street
PO Box 32010
Louisville, Kentucky 40232
www.lge-ku.com

Rick E. Lovekamp
Manager - Regulatory Affairs
T 502-627-3780
F 502-627-3213
rick.lovekamp@lge-ku.com

February 14, 2011

RE: RICHARD A. GENTNER, COMPLAINANT V. KENTUCKY
UTILITIES COMPANY DEFENDANT
CASE NO. 2010-00438

Dear Mr. DeRouen:

Kentucky Utilities Company files herewith the original and ten (10) copies of its Response to the First Data Request of Commission Staff dated February 3, 2011 in the above-cited case.

Also enclosed are an original and ten (10) copies of a Petition for Confidential Protection regarding certain information provided in response to Question No. 1.

A copy is being mailed to the Complainant.

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

Sincerely,

A handwritten signature in black ink that reads "Rick E. Lovekamp".

Rick E. Lovekamp

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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FEB 14 2011

**PUBLIC SERVICE
COMMISSION**

RICHARD A. GENTNER
COMPLAINANT

v.

KENTUCKY UTILITIES COMPANY
DEFENDANT

CASE NO.
2010-00438

* * * * *

**PETITION OF KENTUCKY UTILITIES COMPANY
FOR CONFIDENTIAL PROTECTION**

Kentucky Utilities Company (“KU”) hereby petitions the Kentucky Public Service Commission (“Commission”) pursuant to 807 KAR 5:001, Section 7, and KRS 61.878(1)(a) to grant confidential protection for the items described herein, which KU has provided in support of its Responses to the Commission Staff’s First Data Request in this proceeding. In support of this Petition, KU states as follows:

1. The Kentucky Open Records Act exempts from disclosure certain information of a personal nature where public disclosure would constitute a clearly unwarranted invasion of personal privacy. KRS 61.878(1)(a).

2. In the response to Request No. 1 of the Commission Staff, KU attached copies of some of Complainant’s electric utility bills. This information contains the customer’s account

number and merits confidential protection because KU believes that revealing their contents in the public record could result in an unwarranted invasion of personal privacy.

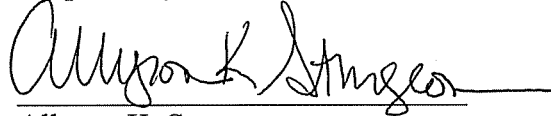
3. If the Commission disagrees with this request for confidential protection, however, it must hold an evidentiary hearing (a) to protect KU's due process rights and (b) to supply the Commission with a complete record to enable it to reach a decision with regard to this matter. Utility Regulatory Commission v. Kentucky Water Service Company, Inc., Ky. App., 642 S.W.2d 591, 592-94 (1982).

4. KU will disclose the confidential documents, pursuant to a protective agreement, to intervenors and others with a legitimate interest in this information and as required by the Commission. In accordance with the provisions of 807 KAR 5:001 Section 7, KU herewith files with the Commission one copy of the above-discussed documents with the confidential information highlighted and ten (10) copies of its response without the confidential information.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission grant confidential protection for the information at issue, or in the alternative, schedule an evidentiary hearing on all factual issues while maintaining the confidentiality of the information pending the outcome of the hearing.

Dated: February 14, 2011

Respectfully submitted,



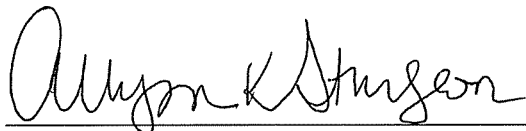
Allyson K. Sturgeon
Senior Corporate Attorney
E.ON U.S. LLC
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088

Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following on the 14th day of February, 2011, U.S. mail, postage prepaid:

Richard A. Gentner
P.O. Box 1893
Richmond, Kentucky 40476



Counsel for Kentucky Utilities Company

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

FEB 14 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

RICHARD A. GENTNER
COMPLAINANT

)
) CASE NO.
) 2010-00438

V.

KENTUCKY UTILITIES COMPANY
DEFENDANT

)
)

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
COMMISSION STAFF'S FIRST DATA REQUEST
DATED FEBRUARY 3, 2011

FILED: February 14, 2011

VERIFICATION

COMMONWEALTH OF KENTUCKY)
) SS:
COUNTY OF JEFFERSON)

The undersigned, **Timothy A. Melton**, being duly sworn, deposes and says that he is Manager – Customer Commitment for LG&E and KU Services Company and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Timothy A. Melton

Timothy A. Melton

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 14th day of February 2011.

Andi Z. Gardner (SEAL)

Notary Public

My Commission Expires:

SHERIL L. GARDNER
Notary Public, State at Large, KY
My commission expires Dec. 24, 2013

KENTUCKY UTILITIES COMPANY

**Response to Commission Staff's First Data Request
Dated February 3, 2011**

Case No. 2010-00438

Question No. 1

Witness: Timothy A. Melton

- Q-1. Provide copies of all Complainant's electric utility bills for January 2010, February 2010, and the bill with the due date of June 15, 2010.
- A-1. Please see the attached copies of Complainant's KU bills for the months requested. A petition for the confidential treatment of information contained in these documents is being filed simultaneously herewith.



Customer Service: 1-800-981-0600 Mon-Fri
 7AM-7PM(EST)
 Walk-In Center Hours: Mon-Fri 8AM-5PM(EST)
 Telephone Payments: (800) 807-3596
 www.eon-us.com

DUE DATE	AMOUNT DUE
01/18/10	\$7.40

Please have your account number available when calling to discuss your account.

ACCOUNT INFORMATION	
Account Number:	[REDACTED]
Account Name:	RICHARD A GENTNER
Service Address:	915 Villa Dr Apt 38
Next Read Will Occur:	01/29/10 - 02/04/10

Averages for Billing Period	This Year	Last Year
Average Temperature	34°	37°
Number of Days Billed	34	34
Electric/kwh per day	44.0	48.5

BILLING SUMMARY	
Previous Balance	71.50
Payment as of 01/05	(125.00)
Balance as of 01/05	(53.50)
Electric Charges	107.30
Taxes and Fees	5.22
Utility Charges as of 01/05	112.52
Other Charges	2.90
Budget Amount	58.00
Total Amount Due	7.40

ELECTRIC CHARGES			
Rate Type: All Electric Residential Service		Meter Reading Information	
Customer Charge	5.00	Meter # C385731	
Energy Charge	88.07	Actual-Reading on 01/04	97944
		Previous Reading on 12/01	96446
Other Charges For Above Rates		Current kwh Usage	1498
Fuel Adjustment (\$0.00138- x 1498 kwh)	-2.07	Meter Multiplier	1
Electric DSM (\$0.00202 x 1498.00 kwh)	3.03	Metered kwh Usage	1498
Environmental Surcharge (13.950% x \$94.03)	13.12		
Home Energy Assistance Fund Charge	0.15		
Total Electric Charges	\$107.30		
OTHER CHARGES			
Late Payment Charge	2.90		
Total Other Charges Due	\$2.90		
TAXES AND FEES			
Rate Increase For School Tax (3.000% x \$107.15)	3.21		
Franchise Fee-Richmond (1.88% x \$107.15)	2.01		
Total Taxes and Fees	\$5.22		

Please see reverse side for additional charges.

Bring entire bill when paying in person.

Customer Service 1-800-981-0600

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

Account Number	Payment Due Date	Amount Due by Due Date	Amount Due 3 Days After Due Date	Winter Care Donation	Amount Enclosed
[REDACTED]	01/18/10	\$7.40	\$7.77		\$

Check here if plan(s) requested on back of stub

Home Phone (859) 623-3790
 OFFICE USE ONLY:
 MRU02231512, G000000
 P71.50
 PF:Y eB:P



PO BOX 539013
 ATLANTA, GA 30353-9013

#200422627 6#
 RICHARD A GENTNER
 P.O. BOX 1893
 RICHMOND KY 40476-1893

PRINTED ON RECYCLED PAPER
 Rev. 08.12.01

Service Address: 915 Villa Dr Apt 38

020 [REDACTED] 00000000007770000000074000580000000015

BILLING INFORMATION

Late Charge to be Assessed 3 Days After Due Date	\$0.37
Actual billings to date	\$620.91
Budget Roll-In	\$0.00
Budget amount	\$58.00
Actual account balance after paying this bill	\$19.91
Budget settle month	February

IMPORTANT INFORMATION

Our new customer information system now allows us to calculate your average energy usage and weather information based on the actual meter reading date. Previously, we had calculated your average usage and weather information based on the scheduled meter reading date; therefore, the amount displayed on the front of this bill as last year's information may differ from last year's bill.

The power to save. It's in your hands. The amount of electricity you consumed during this billing cycle result in the production of approximately 2,996 pounds of CO2 (carbon). A typical residential customer uses 1,000 kilowatt hours of electricity per month, which would result in the production of 2,000 lbs. of carbon. Visit our Web site at eon-us.com for Smart Saver tips designed to help you better manage and lessen the environmental impact of your energy usage.

For a copy of your rate schedule, visit www.eon-us.com or call our Customer Service Department.

Please make note of your new account number, which can be found on the front of your bill. Your old account number, [REDACTED] is no longer valid but is provided here for reference purposes only.

New enrollment only - **Please check box(es) below and on front of stub.**

- I would like to enroll in Demand Conservation.
- Automatic Bank Club (voided check must be provided). *Please note that any past due balance on your KU account will be debited from your bank account immediately upon enrollment in the ABC program. To avoid unintended debits to your bank account, please make sure your KU account balance is current before enrolling in ABC.*

Please deduct my Automatic Bank Club Payment from my Checking Account.

I hereby authorize KU to debit my bank account for payment of my monthly bill. This authorization applies to all my current and future KU accounts, and will remain in effect until revoked by me or KU.

Signature: _____

Date: _____

Processing Automatic Bank Club requests can take up to two billing cycles. Please continue making regular payments until you receive a bill that indicates the amount due will be deducted from your bank account on the payment due date.



Customer Service: 1-800-981-0600 Mon-Fri
 7AM-7PM(EST)
 Walk-In Center Hours: Mon-Fri 8AM-5PM(EST)
 Telephone Payments: (800) 807-3596
 www.eon-us.com

DUE DATE	AMOUNT DUE
02/15/10	\$137.58

Current due date applies to the current bill only. Previous amount due may be subject to disconnection.

ACCOUNT INFORMATION	
Account Number:	[REDACTED]
Account Name:	RICHARD A GENTNER
Service Address:	915 Villa Dr Apt 38
Next Read Will Occur:	03/01/10 - 03/05/10

Averages for Billing Period	This Year	Last Year
Average Temperature	30°	28°
Number of Days Billed	29	28
Electric/kwh per day	48.5	55.6

BILLING SUMMARY	
Previous Balance	7.40
Payment as of 02/03	0.00
Balance as of 02/03	7.40
Electric Charges	111.31
Taxes and Fees	5.49
Utility Charges as of 02/03	116.80
Other Charges	13.38
Total Amount Due	137.58

ELECTRIC CHARGES

Rate Type: All Electric Residential Service

Customer Charge	5.00
Energy Charge	90.39
Other Charges For Above Rates	
Fuel Adjustment (\$0.00057 x 1407 kwh)	0.80
Electric DSM (\$0.00202 x 1296.00 kwh)	2.62
Electric DSM (\$0.00202 x 111.00 kwh)	0.22
Environmental Surcharge (12.250% x \$99.03)	12.13
Home Energy Assistance Fund Charge	0.15
Total Electric Charges	\$111.31

Meter Reading Information

Meter # C385731	
Actual Reading on 02/02	99351
Previous Reading on 01/04	97944
Current kwh Usage	1407
Meter Multiplier	1
Metered kwh Usage	1407

OTHER CHARGES

Budget Settlement Adjustment	19.91
Late Payment Charge	0.37
Interest for Cash Sec. Deposit	-6.90
Total Other Charges Due	\$13.38

Please see reverse side for additional charges.

Bring entire bill when paying in person.

Customer Service 1-800-981-0600

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

Account Number	Payment Due Date	Amount Due by Due Date	Amount Due 3 Days After Due Date	Winter Care Donation	Amount Enclosed
[REDACTED]	02/15/10	\$137.58	\$137.58		\$

Check here if plan(s) requested on back of stub

Home Phone (859) 623-3790

OFFICE USE ONLY:
 MRU02231512, G000000
 P7.40
 PF:Y eB:P



PO BOX 539013
 ATLANTA, GA 30353-9013

#203303732 2#
 RICHARD A GENTNER
 P.O. BOX 1893
 RICHMOND KY 40476-1893

PRINTED ON RECYCLED PAPER
 Rev. 10/01/06

Service Address: 915 Villa Dr Apt 38

020 [REDACTED] 0000000013758000000137580000000000015

TAXES AND FEES

Rate Increase For School Tax (3.000% x \$111.16)	3.33
Franchise Fee-Richmond (1.94% x \$111.16)	2.16
Total Taxes and Fees	\$5.49

BILLING INFORMATION

YOUR BUDGET AMOUNT HAS CHANGED

Energy use can change, often due to weather-related heating or cooling. Your account is reviewed periodically so your budget payment will reflect an average of your energy usage. This helps avoid a large account balance on your budget settlement month. Based on your actual consumption, your budget amount has been revised to \$67.00.

Environmental Surcharge: A monthly charge or credit passed on to customers to pay for the cost of pollution-control equipment needed to meet government-mandated air emission reduction requirements.

Franchise Fee: A pass-through of fees paid by the Company to municipalities for the right to serve customers located in those municipalities.

Actual billings to date	\$137.58
Budget Roll-In	\$0.00
Budget amount	\$0.00
Actual account balance after paying this bill	\$0.00
Budget settle month	February

This is the settlement month for your budget payment plan and the account balance is now due. Your budget payment will resume next month.

IMPORTANT INFORMATION

Our new customer information system now allows us to calculate your average energy usage and weather information based on the actual meter reading date. Previously, we had calculated your average usage and weather information based on the scheduled meter reading date; therefore, the amount displayed on the front of this bill as last year's information may differ from last year's bill.

The power to save. It's in your hands. The amount of electricity you consumed during this billing cycle result in the production of approximately 2,814 pounds of CO₂ (carbon). A typical residential customer uses 1,000 kilowatt hours of electricity per month, which would result in the production of 2,000 lbs. of carbon. Visit our Web site at eon-us.com for Smart Saver tips designed to help you better manage and lessen the environmental impact of your energy usage.

For a copy of your rate schedule, visit www.eon-us.com or call our Customer Service Department.

Please make note of your new account number, which can be found on the front of your bill. Your old account number, [REDACTED] is no longer valid but is provided here for reference purposes only.

New enrollment only - **Please check box(es) below and on front of stub.**

- Budget Plan
- I would like to enroll in Demand Conservation.
- Automatic Bank Club (voided check must be provided). *Please note that any past due balance on your KU account will be debited from your bank account immediately upon enrollment in the ABC program. To avoid unintended debits to your bank account, please make sure your KU account balance is current before enrolling in ABC.*

Please deduct my Automatic Bank Club Payment from my Checking Account.

I hereby authorize KU to debit my bank account for payment of my monthly bill. This authorization applies to all my current and future KU accounts, and will remain in effect until revoked by me or KU.

Signature: _____

Date: _____

BILLING INFORMATION

Actual billings to date	\$119.81
Budget Roll-In	\$0.00
Budget amount	\$67.00
Actual account balance after paying this bill	\$52.81
Budget settle month	February

IMPORTANT INFORMATION

Our new customer information system now allows us to calculate your average energy usage and weather information based on the actual meter reading date. Previously, we had calculated your average usage and weather information based on the scheduled meter reading date; therefore, the amount displayed on the front of this bill as last year's information may differ from last year's bill.

The power to save. It's in your hands. The amount of electricity you consumed during this billing cycle result in the production of approximately 2,854 pounds of CO2 (carbon). A typical residential customer uses 1,000 kilowatt hours of electricity per month, which would result in the production of 2,000 lbs. of carbon. Visit our Web site at eon-us.com for Smart Saver tips designed to help you better manage and lessen the environmental impact of your energy usage.

For a copy of your rate schedule, visit www.eon-us.com or call our Customer Service Department.

New enrollment only - **Please check box(es) below and on front of stub.**

- I would like to enroll in Demand Conservation.
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I hereby authorize KU to debit my bank account for payment of my monthly bill. This authorization applies to all my current and future KU accounts, and will remain in effect until revoked by me or KU.

Signature: _____

Date: _____

Processing Automatic Bank Club requests can take up to two billing cycles. Please continue making regular payments until you receive a bill that indicates the amount due will be deducted from your bank account on the payment due date.



Telephone Payments: 1-800-807-3596 (24 hours a day; \$2.95 fee)
 Customer Service: 1-800-981-0600 (M-F, 7 a.m. to 7 p.m. EST)
 Walk-In Center: Open Mon-Fri 8 a.m. to 5 p.m. EST
 Online Customer Self-Service: www.eon-us.com (24 hours a day)

DUE DATE	Pay This Amount
06/15/10	\$93.83

See the "Billing Information" section for details about the pending pledge/payment, late payment charges and service disconnection.

ACCOUNT INFORMATION	
Account Number:	[REDACTED]
Account Name:	RICHARD A GENTNER
Service Address:	915 Villa Dr Apt 38
Next Read Will Occur:	06/30/10 - 07/07/10

Averages for Billing Period	This Year	Last Year
Average Temperature	67°	66°
Number of Days Billed	30	30
Electric/kwh per day	14.5	15.0

BILLING SUMMARY	
Previous Balance	67.00
Payment(s) Received 5/5 - 6/3	-40.12
Balance as of 6/3	26.88
Current Electric Charges	37.01
Current Taxes and Fees	1.83
Current Charges as of 6/3	38.84
Other Charges (See Other Charges Box)	28.11
Total Amount Due	93.83

ELECTRIC CHARGES			
Rate Type: All Electric Residential Service		Meter Reading Information	
Customer Charge	5.00	Meter # C385731	
Energy Charge	28.01	Actual Reading on 6/2	2595
Other Charges For Above Rates		Previous Reading on 5/3	2159
Fuel Adjustment (\$0.00077- x 436 kwh)	-0.34	Current kwh Usage	436
Electric DSM (\$0.00243 x 436.00 kwh)	1.06	Meter Multiplier	1
Environmental Surcharge (9.290% x \$33.73)	3.13	Metered kwh Usage	436
Home Energy Assistance Fund Charge	0.15		
Total Electric Charges	\$37.01		
OTHER CHARGES			
Late Payment Charge	3.35		
Budget True-Up	24.76		
Total Other Charges Due	\$28.11		
TAXES AND FEES			
Rate Increase For School Tax (3.000% x \$36.86)	1.11		
Franchise Fee-Richmond (1.94% x \$36.86)	0.72		
Total Taxes and Fees	\$1.83		

Please see reverse side for additional charges.

Customer Service 1-800-981-0600

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

Account Number	Payment Due Date	Pay This Amount	Pay This Amount 3 Days After Due Date	Winter Care Donation	Amount Enclosed
[REDACTED]	06/15/10	\$93.83	\$95.77		\$

Check here if plan(s) requested on back of stub

OFFICE USE ONLY:
 MRU02231512, G000000
 P67.00
 PF:Y eB:P



PO BOX 539013
 ATLANTA, GA 30353-9013

#215307492 3#
 RICHARD A GENTNER
 PO BOX 1893
 RICHMOND KY 40476-1893

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 Rev. 10/06/02

Service Address: 915 Villa Dr Apt 38

020 [REDACTED] 00000000095770000000938300000000000011

BILLING INFORMATION

Late Charge to be Assessed 3 Days After Due Date	\$1.94
Actual billings to date	\$93.83
Budget Roll-In	\$0.00
Budget payments received to date	\$0.00
Budget amount	\$0.00
Actual account balance after paying this bill	\$0.00
Budget settle month	February

BUDGET REMOVAL

You have been removed from the budget payment plan and returned to the regular billing method.

IMPORTANT INFORMATION

The power to save. It's in your hands. The amount of electricity you consumed during this billing cycle result in the production of approximately 872 pounds of CO2 (carbon). A typical residential customer uses 1,000 kilowatt hours of electricity per month, which would result in the production of 2,000 lbs. of carbon. Visit our Web site at eon-us.com for Smart Saver tips designed to help you better manage and lessen the environmental impact of your energy usage.

For a copy of your rate schedule, visit www.eon-us.com or call our Customer Service Department.

New enrollment only - Please check box(es) below and on front of stub.

- Budget Plan
- I would like to enroll in Demand Conservation.
- Automatic Bank Club (voided check must be provided). *Please note that any past due balance on your KU account will be debited from your bank account immediately upon enrollment in the ABC program. To avoid unintended debits to your bank account, please make sure your KU account balance is current before enrolling in ABC.*

Please deduct my Automatic Bank Club Payment from my Checking Account.

I hereby authorize KU to debit my bank account for payment of my monthly bill. This authorization applies to all my current and future KU accounts, and will remain in effect until revoked by me or KU.

Signature: _____

Date: _____