

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MICHAEL T. MOORE)	
)	
COMPLAINANT)	
)	
V.)	CASE NO. 2011-00176
)	
DUKE ENERGY KENTUCKY, INC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. ("Duke") is to file with the Commission the original and ten (10) copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 10 days from the date of this Request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.


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

Duke shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Duke fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Duke's Answer filed June 6, 2011 admits that electric meter 72733509 was replaced with the installation of meter number 108011234 on or about February 26, 2010 on Complainant's premises at "330 Center Street, Apartment 3A, Bellevue, Kentucky." The Certificate of Service for the Answer lists Complainant's address as "330 Center Street, Apartment 3D," Bellevue, Kentucky. Complainant's Complaint lists his address as 330 Center Street, Apartment "3D," Bellevue, Kentucky. Confirm that the reference in paragraph 1 of Duke's Answer stating Complainant's address as Apartment "3A" is a typographical error.

2. Duke's Answer at paragraph 10 under its Motion to Dismiss portion refers to "(t)he attached Exhibit A" yet no Exhibit A was attached. Provide Exhibit A referred to in the Answer.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: JUN 10 2011

cc: Parties of record

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