

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

GLEN AND PATRICIA A. DAMRON)	
)	
COMPLAINANTS)	
V.)	CASE NO.
)	2013-00008
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

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

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due no later than 14 days from the date of issuance 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.

LG&E 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 LG&E fails or refuses to furnish all or part of the requested information, LG&E 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. Has LG&E conducted any form of usage investigation for the Complainants' account or for another account at the same location under a prior customer's account?

a. If yes, fully describe the extent of the usage investigation conducted, including details related to the specific analysis performed, time frame of analysis, and any data collected and/or referenced. Provide any and all documentation related to the usage investigation.

b. If no, fully describe and provide documentation of LG&E's policy and procedures for monitoring usage in accordance with 807 KAR 5:006, Section 11(3), and include at least three representative samples of usage investigations performed in accordance with 807 KAR 5:006, Section 11(4), as a result of its usage monitoring policy.

2. Has LG&E attempted any form of billing analysis for the Complainants' account as contemplated by 807 KAR 5:006, Section 11(2)?

a. If yes, fully describe the extent of the billing analysis conducted, including details related to the specific analysis performed, time frame of analysis, and any data collected and/or referenced. Provide any and all documentation related to the billing analysis.

b. If no, explain LG&E's policy and procedures for initiating billing analysis for disputes in accordance with 807 KAR 5:006, Section 11(2), and explain how it was determined that no billing error occurred on the Complainants' account.

3. Provide in complete detail the historical records maintained by LG&E in accordance with 807 KAR 5:006, Section 18, for the meter associated with the Complainants' account.

a. Provide, specifically, the dates of each meter inspection.

b. Provide, specifically, the results of each inspection of the meter associated with the Complainants' account. Specifically note any non-compliant findings from each inspection if such findings exist.

4. Provide copies of the bills or other billing records for the Complainants' account for the time period January 1, 2001 through the most recent month available.

5. Does LG&E have a system in place to monitor customer accounts in order to detect unusual usage patterns that may indicate a problem with the accuracy of the customer's recorded usage prior to billing?

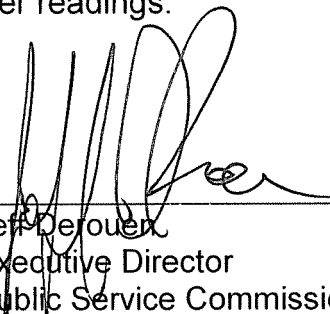
a. If so, describe LG&E's process.

b. If applicable, has LG&E's monitoring process identified usage variances with the Complainants' usage? Provide documentation of any such occurrences.

6. Refer to LG&E's Answer at the top of page 5 where it states that it "admits the fact that one of the meter dials on meter no. 384880 was not properly aligned. However, this misalignment did not impact the effectiveness or accuracy of the meter readings, as clearly indicated in the findings of both meter testing reports."¹

a. Describe the misalignment of the meter dial and discuss possible reasons for the misalignment.

b. Explain why LG&E believes that the misalignment would not impact the effectiveness or accuracy of the meter readings.



Jeff DeJouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

DATED FEB 15 2013

cc: Parties of Record

¹ Answer of Louisville Gas and Electric Company, at para. 4.a., p. 5, filed Jan. 31, 2013.

Glen and Patricia A. Damron
3605 Ten Broeck Way
Louisville, KENTUCKY 40241

Ed Staton
VP - State Regulation and Rates
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

Honorable Allyson K Sturgeon
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202