

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TRACY MATHIS	)	
	)	
COMPLAINANT	)	
V.	)	CASE NO.
	)	2014-00198
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
	)	
DEFENDANT	)	

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

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

Defendant 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 Defendant fails or refuses to furnish all or part of the requested information, Defendant 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.

1. Provide photographs of the overhead service wire at issue in this matter.

Photos are to include:

a. The service pole at or near 163 Crescent Avenue, Louisville, Kentucky, where service wire at issue originates;

b. The service wire as it crosses over the front yard at 163 Crescent Avenue, Louisville, Kentucky, to neighbor's home; and

c. The connection to the neighbor's home where service wire enters the neighbor's home.

2. Provide drawings showing horizontal and vertical views of the overhead service wire, to include:

a. The service pole at or near 163 Crescent Avenue, Louisville, Kentucky, where service wire at issue originates;

b. The service wire as it crosses over the front yard at 163 Crescent Avenue, Louisville, Kentucky to neighbor's home; and

c. The connection to the neighbor's home where service wire enters the neighbor's home.

3. Referring to Paragraph 2(a) of LG&E's Answer, was a new service pole installed when LG&E raised the service wire to the neighbor's house on July 25, 2014?

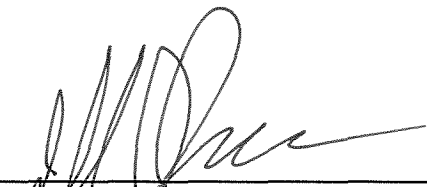
4. Referring to Paragraph 2(a) of LG&E's Answer, what is the current attachment height of the overhead service wire at issue in this matter at the service pole located at or near 163 Crescent Avenue, Louisville, Kentucky?

5. Referring to Paragraph 2(a) of LG&E's Answer, what is the current overhead clearance, at the lowest point, of the overhead service wire at issue in this matter as it crosses over the residential property located at 163 Crescent Avenue, Louisville, Kentucky?

6. Referring to Paragraph 2(a) of LG&E's Answer, what is the current overhead clearance, at the lowest point, of the overhead service wire at issue in this matter as it crosses over the driveway attached to the residential property located at 163 Crescent Avenue, Louisville, Kentucky?

7. Referring to Paragraph 2(a) of LG&E's Answer, what is the current overhead clearance of the overhead service wire at issue in this matter at Tracy Mathis's neighbor's service entrance?

8. On what date was the overhead service drop, at issue in this matter, installed to furnish service to the home neighboring 163 Crescent Avenue, Louisville, Kentucky?



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

DATED AUG 14 2014

cc: Parties of Record