



LG&E Energy LLC
220 West Main Street (40202)
P.O. Box 32030
Louisville, Kentucky 40232

March 31, 2005

Ms. Elizabeth O'Donnell
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40601

MAR 31 2005
RECEIVED
PUBLIC SERVICE COMMISSION

RE: Jill and Robert Wade, Jr. (Case No. 2005-00118) v. KU

Dear Ms. O'Donnell:

In accordance with the Commission's Order dated March 21, 2005, in the above-captioned proceeding, enclosed please find an original and ten (10) copies of the response of Kentucky Utilities Company.

If you have any questions regarding this filing, please contact me at (502) 627-4110.

Sincerely,

John Wolfram
Manager, Regulatory Affairs

JW:mjr

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matters of:)	
)	
JILL AND ROBERT WADE, JR.)	
)	
COMPLAINANT)	CASE NO. 2005-00118
v.)	
)	
KENTUCKY UTILITIES COMPANY)	
)	
DEFENDANT)	

ANSWER OF KENTUCKY UTILITIES COMPANY

In accordance with the Public Service Commission’s (the “Commission”) Order dated March 21, 2005 in the above-captioned proceeding, Kentucky Utilities Company (“KU”) respectfully submits this Answer to the above referenced Complaint filed by Jill M. Wade (“Mrs. Wade”) on March 14, 2005. In support of its Answer, and in response to the specific averments contained in Mrs. Wade’s Complaint, KU states as follows:

1. With respect to the allegations contained in paragraph (a) and (b) of the Complaint, KU admits the factual information set forth in those paragraphs while clarifying that the name of this utility is Kentucky Utilities Company (“KU”).

2. With respect to the allegations contained in the attachment referenced in paragraph (c) of the Complaint, KU states that: The electric service was disconnected by a KU technician on 2/14/05 due to nonpayment from a previous tenant; Mr. and Mrs. Wade were present at the time of the disconnection; KU’s customer service telephone number was provided to Mr. Wade on 2/14/05; Mr. Wade called the number immediately

and KU scheduled a “turn-on” for Tuesday (2/15/05); a different KU technician arrived on 2/15/05 to reconnect the electric service, and found that the meter dial was spinning; the KU technician also found the disconnect sleeves lying on the ground and that the red meter seal had been broken, indicating that tampering had occurred; the KU technician witnessed someone working inside the home with a radio on, indicating power was being used in the residence; in light of the tampering evidence, the KU technician disconnected service which was the second disconnection in two days; the KU technician sealed the meter with a Fort Knox lock.

3. With respect to the allegation set forth in the attachment (paragraph 2) of the Complaint regarding the employee’s seeing “a green tag on the meter at that time [when he arrived at the residence] and he didn’t notice anything unusual about the meter,” KU: Denies that a green seal was on the meter and that it was actually a red seal that had been broken with disconnect sleeves lying on the ground.

4. With respect to the allegation set forth in the attachment (paragraph 4) of the Complaint stating, “The response to our original complaint from KU seemed to imply that because an employee was in the house at the time using electricity, we must have tampered with the meter,” KU reiterates its statement in paragraph 2 above that the KU technician found the disconnect sleeves lying on the ground and that tampering with the red meter seal had occurred.

5. With respect to the allegation set forth in the attachment (paragraph 4) of the Complaint concerning “I believe KU would like some return on a losing account and saw a way to get \$75,” KU denies this claim and further states that the electric service was illegally turned on by someone other than a KU certified technician. The charge assessed

to Mr. & Mrs. Wade was for \$75.50, and states that the following charges were included on the bill:

\$15.50	Customer Representative charge
\$40.00	Field Service charge
\$20.00	Fort Knox lock charge

\$75.50	

6. KU denies all allegations in the Complaint which are not expressly admitted in the foregoing paragraphs of this Answer.

FIRST AFFIRMATIVE DEFENSE

1. The Complainant fails to set forth any claim upon which relief can be granted by this Commission and, therefore, should be dismissed.

SECOND AFFIRMATIVE DEFENSE

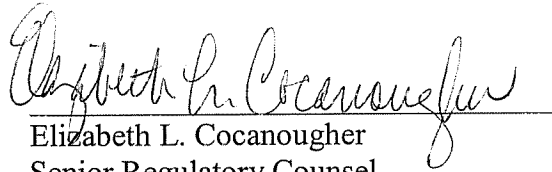
2. The Complainant has failed to set forth a *prima facie* case that KU has violated its tariff or any Commission statute or regulation, and the Complaint should be dismissed for that reason.

WHEREFORE, for all of the reasons set forth above, Kentucky Utilities Company respectfully requests:

- (1) that the Complaint herein be dismissed without further action being taken by the Commission;
- (2) that this matter be closed on the Commission's docket; and
- (3) that KU be afforded any and all other relief to which it may be entitled.

Dated: March 31, 2005

Respectfully submitted,

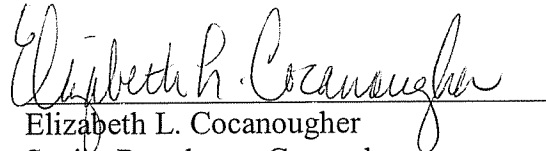
A handwritten signature in cursive script, reading "Elizabeth L. Cocanougher", written over a horizontal line.

Elizabeth L. Cocanougher
Senior Regulatory Counsel
Kentucky Utilities Company
220 West Main Street
Louisville, Kentucky 40202

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Application was served on the Parties of Record on the 31st day of March, 2005, U.S. mail, postage prepaid:

Jill M. Wade and Robert C. Wade Jr.
1404 Horseshoe Bend Road
Sonora, KY 42776


Elizabeth L. Cocanougher
Senior Regulatory Counsel
Kentucky Utilities Company
220 West Main Street
Louisville, Kentucky 40202