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PUBLIC SERVICE  
COMMISSION

November 7, 2005

Elizabeth O'Donnell

Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
Frankfort, KY 40602

RE: Case No 2005-00398, Enrique Espinosa v. Louisville Gas and  
Electric Company.

Dear Ms. O'Donnell:

Enclosed please find an original and four copies of my interroga-  
tories and requests for production of documents addressed to LG&E.

Respectfully submitted,

  
Enrique Espinosa

November 7, 2005

Elizabeth L. Cocanougher  
Senior Corporate Attorney  
LG&E Energy LLC  
220 West Main Street  
Louisville, KY 40202

RE: Interrogatories and requests for production of documents,  
Case No 2005-00398

Dear Ms. Cocanougher:

In accordance with the procedural schedule set forth in the order of the Kentucky Public Service Commission in CASE NO 2005-00398, dated November 2, 2005, I am herewith respectfully requesting your response to the following, no later than November 22, 2005. Please mail the original and four copies of your response to the Commission and one copy to me.

1. In spite of an earlier LG&E statement that my home meter glass was painted (Commission, 4-4-05), on 10-17-05, 3. d., LG&E claims: "it is possible that the problem may have resulted from moisture under the meter glass, rather than the presence of any paint". It is common knowledge that moisture or water causes metal corrosion and growth of bacteria, molds and mildew. As a matter of fact, on October 22, 2005, LG&E instructed me to remove the corrosion of my meter pipes and protect them with paint (Enclosure 1). In view of all of this, please provide a response and documentation for the following:

a. Was the meter at 6104 Orion Road and its index checked for corrosion, dirt, bacteria, mold and mildew growths?. Notice that all these agents may affect the proper function of the meter index to reset to 0000 without showing noticeable physical damage.

b. Was the meter index checked for resetting to 0000 when it was checked as indicated on 10-17-05, 3. 1.?

c. Was the meter index cleaned or treated in any manner?.

d. How long moisture has been a problem for this meter?.

e. How old is this meter?.

f. Is this meter in excess of mechanical limits?.

g. Is this meter in need for replacement?.

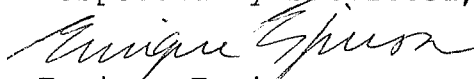
2. On 10-17-05, First Affirmative Defense, LG&E states: "An LG&E representative replaced the glass on the meter on March 31, 2005. On that day, the gas meter was read as "1248". The glass....was changed out again on September 30, 2005, due to the presence of moisture under the glass".

a. Please provide records of the glass replacements, the clarity of these glasses and the record indicating the gas meter reading as "1248" on March 31.

3. In view that LG&E documentation shows actual readings of 9795 February 15, 05, and 1152 March 16 on the meter with the same unreplaced glass (LG&E cites glass replacements only on March 31 and September 30), explain:

a. Why LG&E appears to this date unwilling to accept the actual reading of 9795 February 15, but accepts the actual reading of 1152 March 16, both readings obtained thru the same meter glass?.

Respectfully submitted,

  
Enrique Espinosa

Enclosures: 1

**Natural Gas Customer  
Important Safety Notice**



October 22, 2005

**Louisville Gas and Electric Company**  
Auburndale Operations Center  
6900 Enterprise Dr.  
Louisville, KY 40214

Enrique Espinosa  
6104 Orion Rd  
Louisville, KY 40222

Dear LG&E Customer:

LG&E representatives routinely conduct inspections of the above ground piping leading to and supporting your gas meter. During a recent inspection we noticed that your piping is rusted or corroded. There is not an immediate cause for concern at this time, but rusted pipes can eventually cause gas leaks, which could lead to potential safety hazards.

This gas piping is part of your property. The Kentucky Public Service Commission requires us to inform you about potential problems so that you can take the appropriate steps in order to make corrections. For your safety and the safety of your family, it's extremely important that you keep your gas piping in good repair.

To avoid an interruption of service, comply with state required safety regulations and at the same time protect your property and family, follow the simple steps listed below.

- *Step One:* Remove rust or corrosion from pipes with coarse sand paper or a wire brush;
- *Step Two:* Wipe the pipes clean of debris such as loose paint and dirt;
- *Step Three:* Coat pipes with a good quality paint intended for exterior use on metal. You can even paint the gas meter as long as you do not cover the glass or the meter label.

Our representative will recheck your piping during a future inspection. If you have any questions about this problem or would like additional information, please call myself, Tyler Sibley, at (502) 364-8320 or Joel Casse at (502) 364-8321 with LG&E Gas Regulatory Compliance office weekdays between 8:30 a.m. and 3:30 p.m.

Respectfully,

Tyler Sibley  
Gas Regulatory Coordinator  
LG&E Energy Corp.