

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

November 7, 2005

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

NOV 0 7 2005

PUBLIC STRVICE COMMISSION

RE: Enrique Espinosa (Case No. 2005-00398) v. LG&E

Dear Ms. O'Donnell:

In accordance with the Commission's Order dated November 2, 2005, in the above-captioned proceeding, enclosed please find an original and ten (10) copies of the Interrogatories and Requests for Production of Documents to Enrique Espinosa.

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



NOV 0 7 2005

In the Matter of:	PUBLIC SERVICE COMMISSION
ENRIQUE ESPINOSA)
COMPLAINANT)
v.) CASE NO. 2005-00398
LOUISVILLE GAS AND ELECTRIC COMPANY)
DEFENDANT)

LOUISVILLE GAS AND ELECTRIC COMPANY'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO ENRIQUE ESPINOSA

Louisville Gas and Electric Company ("LG&E") submits its Interrogatories and Requests for Production of Documents to Enrique Espinosa. Please identify by name each person or persons answering each of these Interrogatories or Requests for Production of Documents at the bottom of each response.

- On page 1 of the Attachments to Mr. Espinosa's Complaint, Mr. Espinosa 1. references a photograph of a meter, a copy of which is attached to his Complaint as Enclosure 3.
 - (a) Please confirm that this photograph depicts the gas meter located at 6104 Orion Road, Louisville, Kentucky 40222.
 - (b) Please provide the date that this photograph was taken.
 - (c) Please provide a negative of this photograph or an actual developed print of this photograph.

- 2. At what temperature does Mr. Espinosa typically set his thermostat when he is residing at 6104 Orion Road, Louisville, Kentucky 40222?
- 3. Please provide the quantity and manufacturer's name, model type, and age of each HVAC system located at 6104 Orion Road, Louisville, Kentucky 40222.
- 4. Please provide the name of the HVAC company which services the HVAC system(s) located at 6104 Orion Road, Louisville, Kentucky 40222.
- 5. Please provide the quantity and manufacturer's name, model type, and age of each water heater located at 6104 Orion Road, Louisville, Kentucky 40222.
- 6. Is there a pool located at 6104 Orion Road, Louisville, Kentucky 40222? If so, is it a heated pool?
- 7. Is there a hot tub or sauna located at 6104 Orion Road, Louisville, Kentucky 40222?

Dated: November 7, 2005 Respectfully submitted,

Elizabeth L. Cocanougher Senior Corporate Attorney LG&E Energy LLC 220 West Main Street Louisville, Kentucky 40202 (502) 627-4850

James J. Dimas Senior Corporate Attorney LG&E Energy LLC 220 West Main Street Louisville, Kentucky 40202 502/627-3712

Counsel for Louisville Gas and Electric Company

Elizabeth L. Cocanongherlaks

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following on the 7th day of November, 2005, U.S. mail, postage prepaid:

Enrique Espinosa 6104 Orion Road Louisville, Kentucky 40222

Eurabett L. Coanony en lake
Counsel for Louisville Gas and Electric

Company