

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MARK THURSTON	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO. 2007-00384
	)	
LOUISVILLE GAS AND ELECTRIC COMPANY	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST DATA REQUEST  
TO MARK THURSTON

Mark Thurston ("Complainant") is requested, pursuant to 807 KAR 5:001, to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on October 26, 2007. Each copy of the data requested should be placed in a bound volume with each item tabbed. Responses to requests for information shall be appropriately indexed, for example, Item 1(a), Sheet 2 of 6, and shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be under oath or, for representatives of a public or private corporation, a partnership, an association or a governmental agency, shall 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.

Complainant shall make timely amendment to any prior response if he obtains information upon the basis of which he knows that the response was incorrect when made, or though correct when made, is now incorrect in any material respect. For any request to which the Complainant fails to furnish all or part of the requested information, he shall provide a written explanation of the specific grounds for his failure to furnish.

Careful attention shall be given to copied material to ensure its legibility. 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 the time period(s) in which gas and electric services were provided to the residence located at 8919 Reinhart Way ("Reinhart Way") under your name.

2. Was the property at Reinhart Way a single-family dwelling or a multi-family dwelling?

3. State the date on which you fully vacated the Reinhart Way residence. Provide any supporting documentation.

4. Provide the date when gas service was terminated to your account at the Reinhart Way residence.

5. State the reason(s) gas service was terminated to your account at Reinhart Way and state whether the termination was made on a voluntary or involuntary basis.

6. Provide the date when electric service was terminated to your account at Reinhart Way.

7. State the reason(s) electric service was terminated to your account at Reinhart Way and state whether the termination was made on a voluntary or involuntary basis.

8. If you did not request that electric service to Reinhart Way be disconnected after you vacated the premises, describe any activity inside the premises that would have required the heat to be turned on, i.e., any work done in preparation for readying the house for sale, house being shown to prospective buyers, etc.

9. If electric service continued after you vacated the premises, state the temperature setting on the thermostat.

10. Clarify in detail what was meant by the following statement on page 2 of the complaint: "Meter Reader was averaging during vacancy not per our request."

11. Substantiate the following statement/query contained in the complaint: "Neighbors both sides of my house full capacity during this period of months their bills were only a fraction of our bill."

12. Refer to complaint at page 1, Item (c). Were you receiving monthly bills for the Reinhart Way address between the time you vacated the house and March 2007? State the address to which the bills for Reinhart Way were mailed?

13. Has the Reinhart Way residence been sold? If yes, state the date of sale.

14. State the exact amount in controversy with respect to your account at the property on Reinhart Way.

15. State the date when you fully occupied the residence located at 2804 Hikes Lane ("Hikes Lane").

16. Was the property on Hikes Lane a single-family dwelling or a multi-family dwelling?

17. Provide the date when gas and electric services commenced in your name at the Hikes Lane residence.

18. Were natural gas and electric services provided to the Hikes Lane residence after October 5, 2006? Do you continue to receive natural gas service as well as electric service at the Hikes Lane residence? Explain.

19. Were you ever given any reason to believe that tampering with the electric meter at Hikes Lane may have occurred? If yes, explain.

20. State the exact amount in controversy with respect to your account for the property located on Hikes Lane.

21. Provide copies of all correspondence between you and LG&E relating to billing issues at Reinhart Way and Hikes Lane.

22. Did LG&E explain to your satisfaction the amounts of the contested bills? If no, state in detail why LG&E's explanation failed to resolve your concerns.

23. Did you receive monthly bills for the Hikes Lane residence from October 2006 through March 2007?

- a. If yes, state the address to which these bills were delivered?
- b. If yes, were these bills paid in full?

  
Beth O'Donnell  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

DATED: October 10, 2007

cc: Parties of Record