## RECEDED

Mr. Jeff DeRouen<br>Executive Director<br>Kentucky Public Service Commission<br>211 Sower Boulevard<br>Frankfort, Kentucky 40602-0615

March 12, 2010

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PUBLIC SERVICE COMMISSION

## RE: METRO PROPERTY MANAGEMENT COMPANY, INC./TINA <br> HIGDON COMPLAINANT V. LOUISVILLE GAS AND ELECRIC COMPANY DEFENDANT <br> CASE NO. 2009-00462

Dear Mr. DeRouen:
Louisville Gas and Electric Company files herewith the original and ten (10) copies of its Response to the First Data Request of Complainant dated February 23, 2010 in the above-cited case.

Also enclosed are an original and ten (10) copies of a Petition for Confidential Protection regarding certain information provided in response to Question No. 6.

A copy is being mailed to the Complainant.
Please contact me if you have any questions concerning this filing.

Sincerely,


Rick E. Lovekamp

## Louisville Gas and Electric Company

State Regulation and Rates 220 West Main Street
PO Box 32010
Louisville, Kentucky 40232
www.eon-us.com

Rick E. Lovekamp
Manager - Regulatory Affairs
T 502-627-3780
F 502-627-3213
rick.lovekamp@eon-us.com

## COMMONWEALTH OF KENTUCKY <br> BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:


RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
COMPLAINANT'S FIRST DATA REQUEST
DATED FEBRUARY 23, 2010

FILED: March 12, 2010

## VERIFICATION

## COMMONWEALTH OF KENTUCKY ) <br> ) SS: <br> COUNTY OF JEFFERSON <br> )

The undersigned, Cheryl E. Bruner, being duly sworn, deposes and says that she is Director - Customer Service and Marketing for E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.


Subscribed and sworn to before me, a Notary Public in and before said County and State, this $12^{ \pm n}$ day of Maud h 2010.


My Commission Expires:


# LOUISVILLE GAS AND ELECTRIC COMPANY 

# Response to Complainant's First Data Request Dated February 23, 2010 

Case No. 2009-00462

## Question No. 1

Witness: Cheryl E. Bruner

Q-1. With regard to the statement of LG\&E that the billing name and address problems have been resolved and corrected, I would like to know how LG\&E corrected these problems?

A-1. LG\&E was made aware of the issue in April 2009 by the customer who received the bills in error. A Company representative worked with the customer, and they mutually identified seven accounts. LG\&E then contacted Ms. Higdon to inform her of the error. The Company representative corrected the accounts and sent copies of bills to Ms. Higdon. Ms. Higdon was asked to please contact the Company representative directly if there were any future issues or concerns.

In December, Ms. Higdon mailed copies of bills with different variations of names and/or mailing addresses to Company representative. These accounts were also corrected to reflect a consistent name, mailing address and tax identification number.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

# Response to Complainant's First Data Request <br> Dated February 23, 2010 

Case No. 2009-00462
Question No. 2
Witness: Cheryl E. Bruner

Q-2. I have been told since May of 2009 that my accounts were all reviewed and corrected. Each month we would have issues. How after 11 months can I be assured this is actually resolved?

A-2. LG\&E has worked with Ms. Higdon to review the Metro Property Management Company, Inc. accounts identified by Ms. Higdon and believes that the name, mailing address and tax identification numbers on all such accounts are now correct. LG\&E has also advised Ms. Higdon to contact the Company with any changes or corrections in the future.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

# Response to Complainant's First Data Request Dated February 23, 2010 

Case No. 2009-00462
Question No. 3
Witness: Cheryl E. Bruner

Q-3 I would also like to know how in fact my bills, under my tax identification number were changed and mailed to another company with a different address and tax identification number without my authorization?

A-3. As stated in LG\&E's reply dated February 17, 2010, this billing problem was the result of an error when converting the data from the old Customer Information System (CIS) to the new Customer Care System (CCS). Specifically, some of Ms. Higdon's accounts had a shortened name ("Metro Properties") in the prior CIS system, instead of the full legal name of Metro Property Management Co. Inc. Despite this issue, the monthly bills from CIS were being mailed to the correct address. With the conversion to the new CCS system, some of the accounts with shortened names were automatically associated with the accounts of a different customer with a similar business name, and these accounts began being mailed to the other customer's address. This occurred because the CCS system is capable of having more information on a customer's account than CIS did, including the new field of a "Business Partner" name. When the customer information was mapped from CIS to CCS for the conversion, the incorrect information in CIS revealed itself and resulted in some bills being mailed to the other customer with a similar name in error. The customer's tax I.D. number is not contained on the monthly bill. However, because some of Ms. Higdon's bills were mailed to the wrong customer, the Company changed those account numbers during the correction process.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

## Response to Complainant's First Data Request <br> Dated February 23, 2010

Case No. 2009-00462

Question No. 4
Witness: Cheryl E. Bruner

Q-4. I would also like to ask how I can be assured that this will not happen again?

A-4. As stated in response to Question No. 3 the billing address error was a result of the conversion process to the new Customer Care System. Because the conversion process was a one-time event (and not a recurring business practice), it should not be an issue in the future. However, should Ms. Higdon have any future concerns about her accounts, she is asked to please contact any of the Company representatives she interacts with so that a resolution can be expedited.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

# Response to Complainant's First Data Request <br> Dated February 23, 2010 

Case No. 2009-00462

## Question No. 5

Witness: Cheryl E. Bruner

Q-5. I have a total of 210 addresses, and I would like to ask LG\&E if in fact each address has been checked and corrected?

A-5. LG\&E has checked Metro Property Management Company, Inc. accounts at the following premise addresses:

- Chinquapin Lane
- Twin Oak Lane
- Old Hazelwood Ave./Hazelwood Ave.
- Woodmore Ave.
- Manslick Rd.

The number of accounts in the name of Metro Property Management Co., Inc. fluctuates from month to month because when Metro Property Management Co., Inc. rents an apartment, the account may be changed to the tenant's name.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

# Response to Complainant's First Data Request <br> Dated February 23, 2010 

Case No. 2009-00462

## Question No. 6

Witness: Cheryl E. Bruner

Q-6. In response to the LG\&E statement that the new system is designed to prevent bills from being mailed when the usage or meter readings appears to be out of line with historic consumption, this is a completely inaccurate statement. I would ask LG\&E to provide two years of monthly usage and total \$ billed for both gas and electric on the attached service addresses for the Service Commission to review. (The actual account numbers changed on various accounts by LG\&E to fix their billing errors.)

1) 3102 Chinquapin Lane
2) 3126 Chinquapin Lane
3) 3100 Chinquapin Lane
4) 3203 Twin Oak Lane

A-6. In February 2009, LG\&E informed all customers in a bill insert that their account numbers would be changing with the implementation of the new Customer Care System. In addition, the account number for the address of 3100 Chinquapin Lane was changed in June 2009 due to billing address error for April, May and June 2009.

Attached is the usage history for the addresses listed above. This information is provided pursuant to a Petition for Confidential Protection.

Please note that the usage history does show on numerous occasions that meters at 3100 Chinquapin Ln and 3203 Twin Oak Ln registered no usage, thus initiating a billing exception review.
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| Utility Billed Dollars | Tax and Fees | KWH | CCF | Number of Lights | Number of Poles |
| :---: | :---: | :---: | :---: | :---: | :---: |
| \$ | \$ | KWH | CCF |  |  |
| 10.32 | 0.00 | 1 |  | 0 |  |
| 140.33 | 0.00 |  | 117 | 0 |  |
| 150.65 | 0.00 | 1 | 117 | 0 |  |
| 10.32 | 0.00 | 1 |  | 0 |  |
| 131.32 | 0.00 |  | 108 | 0 |  |
| 141.64 | 0.00 | 1 | 108 | 0 |  |
| 10.29 | 0.00 | 1 |  | 0 |  |
| 101.00 | 0.00 |  | 72 | 0 |  |
| 111.29 | 0.00 | 1 | 72 | 0 |  |
| 10.48 | 0.00 | 1 |  | 0 |  |
| 123.78 | 0.00 |  | 76 | 0 |  |
| 134.26 | 0.00 | 1 | 76 | 0 |  |
| 10.77 | 0.00 | 3 |  | 0 |  |
| 97.17 | 0.00 |  | 57 | 0 |  |
| 107.94 | 0.00 | 3 | 57 | 0 |  |
| 11.24 | 0.00 | 8 |  | 0 |  |
| 91.92 | 0.00 |  | 47 | 0 |  |
| 103.16 | 0.00 | 8 | 47 | 0 |  |
| 10.49 | 0.00 | 1 |  | 0 |  |
| 94.50 | 0.00 |  | 41 | 0 |  |
| 104.99 | 0.00 | 1 | 41 | 0 |  |
| 10.58 | 0.00 | 1 |  | 0 |  |
| 108.47 | 0.00 |  | 48 | 0 |  |
| 119.05 | 0.00 | 1 | 48 | 0 |  |
| 10.68 | 0.00 | 2 |  | 0 |  |
| 170.48 | 0.00 |  | 86 | 0 |  |
| 181.16 | 0.00 | 2 | 86 | 0 |  |
| 10.96 | 0.00 | 6 |  | 0 |  |
| 159.80 | 0.00 |  | 108 | 0 |  |
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| Utility | Billed Dollars | Tax and Fees | KWH | CCF | Number of Lights | Number of Poles |
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|  | \$ | \$ | KWH | CCF |  |  |
|  | 85.38 | 0.00 | 1,032 |  | 0 |  |
|  | 34.86 | 0.00 | 207 |  | 0 |  |
|  | 10.26 | 0.00 | 1 |  | 0 |  |
|  | 307.77 | 0.00 |  | 278 | 0 |  |
|  | 438.27 | 0.00 | 1,240 | 278 | 0 |  |
|  | 88.11 | 0.00 | 894 |  | 0 |  |
|  | 35.54 | 0.00 | 180 |  | 0 |  |
|  | 10.47 | 0.00 | 2 |  | 0 |  |
|  | 289.65 | 0.00 |  | 256 | 0 |  |
|  | 423.77 | 0.00 | 1,076 | 256 | 0 |  |
|  | 87.69 | 0.00 | 834 |  | 0 |  |
|  | 35.64 | 0.00 | 168 |  | 0 |  |
|  | 10.29 | 0.00 | 1 |  | 0 |  |
|  | 281.19 | 0.00 |  | 227 | 0 |  |
|  | 414.81 | 0.00 | 1,003 | 227 | 0 |  |
|  | 88.41 | 0.00 | 762 |  | 0 |  |
|  | 36.00 | 0.00 | 153 |  | 0 |  |
|  | 10.48 | 0.00 | 1 |  | 0 |  |
|  | 316.91 | 0.00 |  | 214 | 0 |  |
|  | 451.80 | 0.00 | 916 | 214 | 0 |  |
|  | 89.78 | 0.00 | 810 |  | 0 |  |
|  | 36.46 | 0.00 | 165 |  | 0 |  |
|  | 10.67 | 0.00 | 2 |  | 0 |  |
|  | 290.30 | 0.00 |  | 195 | 0 |  |
|  | 427.21 | 0.00 | 977 | 195 | 0 |  |
|  | 91.90 | 0.00 | 888 |  | 0 |  |
|  | 36.95 | 0.00 | 180 |  | 0 |  |
|  | 10.98 | 0.00 | 5 |  | 0 |  |
|  | 256.33 | 0.00 |  | 151 | 0 |  |
|  | 396.16 | 0.00 | 1,073 | 151 | 0 |  |



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|  | 91.69 | 0.00 |
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|  | 37.30 | 0.00 |
|  | 10.80 | 0.00 |
|  | 322.66 | 0.00 |
|  | 464.90 | 0.00 |
|  | 93.49 | 0.00 |
|  | 37.22 | 0.00 |
|  | 10.91 | 0.00 |
|  | 315.18 | 0.00 |
|  | 456.80 | 0.00 |
|  | 88.65 | 0.00 |
|  | 36.23 | 0.00 |
|  | 10.52 | 0.00 |
|  | 378.66 | 0.00 |
|  | 514.06 | 0.00 |
|  | 91.03 | 0.00 |
|  | 36.70 | 0.00 |
|  | 10.89 | 0.00 |
|  | 470.93 | 0.00 |
|  | 609.55 | 0.00 |
|  | 95.55 | 0.00 |
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| 86.74 | 5.20 | 1,037 |  | 6 | 1 |
| 34.96 | 2.10 | 210 |  | 3 | 1 |
| 121.70 | 7.30 | 1,247 |  | 9 | 2 |
| 268.33 | 16.09 | 1,248 | 178 | 9 | 2 |
| 5.78 | 0.35 | 76 |  | 6 | 1 |
| 2.34 | 0.14 | 15 |  | 3 | 1 |
| 8.12 | 0.49 | 91 |  | 9 | 2 |
| 10.13 | 0.61 | 0 |  | 0 |  |
| 206.95 | 12.42 |  | 273 | 0 |  |
| 27.65 | 1.66 | 399 |  | 2 |  |
| 244.73 | 14.69 | 399 | 273 | 2 |  |
| 28.33 | 1.70 | 409 |  | 2 |  |
| 24.03 | 1.44 | 183 |  | 0 |  |
| 261.84 | 15.71 |  | 369 | 0 |  |
| 285.87 | 17.15 | 183 | 369 | 0 |  |
| 314.20 | 18.85 | 592 | 369 | 2 |  |
| 19.14 | 1.15 | 112 |  | 0 |  |
| 276.52 | 16.59 |  | 377 | 0 |  |
| 29.12 | 1.75 | 360 |  | 2 |  |
| 324.78 | 19.49 | 472 | 377 | 2 |  |
| 891.83 | 53.52 | 1.554 | 1.019 | 15 | 2 |
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# LOUISVILLE GAS AND ELECTRIC COMPANY 

# Response to Complainant's First Data Request Dated February 23, 2010 

Case No. 2009-00462

## Question No. 7

Witness: Cheryl E. Bruner

Q-7. You will find these house meter accounts change very little. A serious leak, weather change, or a large vacancy change will vary a bill some but over all these accounts stay close in line. I was told over and over by several LG\&E employees this was happening because of LOW ELECTRICAL USAGE. These house meters are for the heating of hot water per building and recently also outdoor lighting. I would like to know which statement by LG\&E is accurate.

A-7. Although the Commission's regulations require the Company to monitor customers' usage at least once annually, in practice, LG\&E monitors consumption every month. To this end, LG\&E has parameters programmed into its Customer Care System (CCS) to detect unusual deviations in a customer's usage. Although the Commission's regulation does not specifically define what may constitute an "unusual deviation in the customer's consumption", the parameters in LG\&E's CCS will create a billing exception on an account when there has been no usage on a device from one month to the next or when there are large variances (either up or down) from one month to another or from same period in the prior year in the customer's consumption. If the current month's usage is beyond the set parameter, a billing exception will be generated from CCS. Once a billing exception is created an audit of the account is conducted to determine what actions are required to validate the customer's usage. Not all billing exceptions are billing problems, but can be the result of weather-related swings or changes in the consumption patterns for customers. Thus, the results of the review may range from doing nothing, to re-reading the meter, to contacting the customer for additional information.

Please see response to Question No. 6.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

## Response to Complainant's First Data Request <br> Dated February 23, 2010

Case No. 2009-00462

Question No. 8
Witness: Cheryl E. Bruner

Q-8. I would also like to know "what" changes LG\&E has made to reduce the number of delayed bills?

A-8. As stated in the response filed by LG\&E on December 18, 2009, the Company has marked (placed on a "no usage" list) Metro Property Management Company, Inc. "house" meters for the 3100 Chinquapin Ln and 3203 Twin Oak Ln accounts to prevent the system from triggering the billing exception monthly when there is no usage. Instead these accounts will be evaluated on a yearly basis as required by Commission regulations.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

## Response to Complainant's First Data Request <br> Dated February 23, 2010

Case No. 2009-00462
Question No. 9
Witness: Cheryl E. Bruner

Q-9. Again, this is something I was told over and over each month and still had problems. What has changed the situation today?

A-9. Please see response to Question No. 8.

# LOUISVILLE GAS AND ELECTRIC COMPANY 

## Response to Complainant's First Data Request <br> Dated February 23, 2010

Case No. 2009-00462
Question No. 10
Witness: Cheryl E. Bruner

Q-10. It is very clear by the statement LG\&E has made stating they have reduced the number of bills being delayed that this problem is not resolved. It is completely unbelievable that a customer would have to beg for a bill over and over again. It is completely absurd that your new billing system would not bill properly and promptly each month and even more absurd to change my name, address and tax identification number to bill MY accounts to a different company. That is a privacy issue also! Until April of 2009 I have never had these issues in the aprox. 25 years we have been dealing with LG\&E.

A-10. LG\&E believes all billing issues have been resolved with Metro Property Management Company, Inc. Again, where certain account numbers were disclosed to another customer when bills were mailed to the incorrect address, the Company changed those account numbers as a part of the correction process.

