

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BRENDA JOYCE CLAYTON)	
)	
COMPLAINANT)	
)	CASE NO.
V.)	2011-00211
)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
)	
DEFENDANT)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO LOUISVILLE GAS AND ELECTRIC COMPANY

Louisville Gas and Electric Company ("LG&E"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due 20 days from the date of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

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

LG&E shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E fails or refuses to furnish all or part of the requested information, LG&E shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. 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. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Refer to page 2 of LG&E's September 12, 2011 Answer ("Answer") to the complaint of Brenda Joyce Clayton ("Ms. Clayton"), beginning at the sixth line from the bottom of the page and continuing through the eighth line on page 3.

a. The text states that Ms. Clayton's electric service was disconnected on June 3, 2009, that she contacted LG&E on June 11, 2009 about getting that service restored, and that at that time, "She was told someone would contact her with a split quote." Explain why Ms. Clayton was not contacted by an LG&E representative between June 11 and June 22, 2009 to be given the split quote she eventually received after she spoke with a representative on June 22, 2009.

b. The text indicates that Ms. Clayton had no electric service from June 3, 2009 until June 26, 2009, a period of 23 days. Eleven of the 23 days was the time between when Ms. Clayton "[w]as told someone would contact her with a split

quote” and the time that she contacted LG&E and received a split quote “[a]fter not hearing back from an LG&E representative” Explain why 11 days were allowed to lapse with no apparent effort on the part of LG&E to contact Ms. Clayton with the split quote she was advised of on June 11, 2009.

c. Provide a general description of LG&E’s internal record-keeping procedure for tracking a situation such as Ms. Clayton’s, in which LG&E indicates that the next step in the process will be for it to contact the customer, to ensure that, in fact, the customer is contacted by LG&E.

2. Refer to page 3 of the Answer at which LG&E states that, “On June 26, 2009, Ms. Clayton paid \$107 and a new account, Acct. 7727, was created for her service reflecting that her gas service obligations had been split from her electric service obligation.” Confirm that the new account, Acct. 7727, was intended to be an electric-only account for Ms. Clayton. If not, explain the purpose of the new account.

3. Refer to page 3 of the Answer at which LG&E states that, “A final bill was mailed for Acct. 1447, with a due date of September 21, 2009, reflecting a \$485.79 balance (after applying a \$240 deposit, \$7.70 in deposit interest, and Ms. Clayton’s two payments totaling \$357 made in June 2009).” Provide a breakdown of the deposit between gas and electric service.

4. State whether Acct. 1447 was intended to remain as a gas-only account for Ms. Clayton. If not, explain.

5. Refer to page 4 of the Answer which states that LG&E posted a credit of \$601.19 to Ms. Clayton’s bill due October 13, 2009, and transferred a balance of \$485.79 from Acct. 1447.

a. Provide a detailed breakdown of the \$601.19 credit which shows the amounts for gas and electric service, as well as a breakdown of each of those amounts into the following categories: amounts for service; late payment penalties; and other miscellaneous charges or credits (identifying the miscellaneous charges and credits).

b. Explain why the \$601.19 was credited to Ms. Clayton's bill.

c. Provide a breakdown of the \$485.79 transferred into the accounts representing gas and electric service.

d. Explain why the entire balance was transferred to the electric only account, Acct. 7727.

e. Explain the relationship, if any, between the \$485.79 and the \$601.19.

6. Refer to page 5 of the Answer at which LG&E states that, "In March 2011, LG&E determined Ms. Clayton had been erroneously charged Customer Charges on her gas service while the gas service was disconnected. As a result, LG&E placed a credit of \$84.36 on Acct. 7727 for all service charges incurred for the period June 2009 to March 2010 while Ms. Clayton's gas service was disconnected." Provide a breakdown of the \$84.36 by the month and amount it was meant to credit.

7. Refer to page 7 of the Answer at which LG&E states that Ms. Clayton was "mistakenly disconnected" while the informal complaint was pending. Explain how this disconnection occurred and describe the steps LG&E has taken to ensure that such disconnections are not repeated in the future.

8. Refer to page 6 of the Answer, beginning at the fifth line from the bottom of the page and continuing through the fifth line on page 7. This text indicates that, in response to Ms. Clayton's question regarding how much she needed to pay to have her gas service restored, an LG&E representative, after checking only her electric account, mistakenly told her that the total amount of her bill was \$32.06.

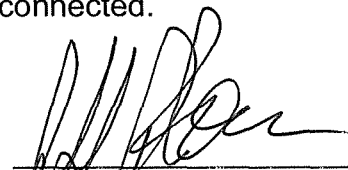
a. Provide a general description of the type of account information an LG&E customer representative has ready access to when the representative is on the phone speaking with a customer.

b. Explain, in the case of the October 15, 2009 phone call in which Ms. Clayton was told that the total amount of her bill was \$32.09, whether LG&E is able to determine if the representative speaking with Ms. Clayton was, or was not, able to access all of Ms. Clayton's account information, including the amounts due on both her electric and gas accounts.

9. Refer to page 7 of the Answer at which LG&E states that, "On March 3, 2011, Ms. Clayton called for a one-day extension to pay her bill. At that time, it was discovered that Ms. Clayton's gas service was mistakenly reconnected in March 2010, apparently without noting the outstanding balance." Explain how LG&E could have been unaware that gas service had been restored to Ms. Clayton's residence from March 2010 to March 2011 when it had charged her for gas usage during that period.

10. Refer to page 7 of the Answer, specifically, the three lines immediately preceding paragraph 4, which state that Ms. Clayton's service was disconnected during

the pendency of her informal complaint. Provide, in chronological order, the listing of the actions that led to Ms. Clayton's service being disconnected.



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DATED NOV 15 2011

cc: Parties of Record

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