## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DOUGLAS AND SYLVIA MORRISON COMPLAINANT V. V. KENTUCKY POWER COMPANY DEFENDANT ) CASE NO. 2015-00136 ) DEFENDANT )

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 23, 2015. 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. Kentucky Power 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 Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power 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. When filing a document containing personal information, Kentucky Power shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Provide copies of monthly statements that reflect usage and charges for combined electric/outdoor lighting service at 440 31<sup>st</sup> Street, Ashland, Kentucky, from April 2010 to April 2015.

State under which tariff code the dusk-to-dawn lamp on Kentucky Power
Pole No. 2184 was billed.

3. Provide copies of monthly statements that reflect usage and charges for combined electric/outdoor lighting service at 440 31<sup>st</sup> Street, Ashland, Kentucky, from April 9, 1996, to April 1997.

Case No. 2015-00136

-2-

4. Refer to the Answer of Kentucky Power to the Complaint of Douglas and Sylvia Morrison ("Answer"), paragraph 5(g). Provide copies of the records that indicate the dusk-to-dawn lamp formerly installed on Kentucky Power Pole No. 2184 was installed on April 7, 1992.

5. Refer to the Answer, paragraph 5(h).

a. Provide copies of any documentation showing that it was Kentucky Power's practice to confirm with the person establishing service at a residence with an existing associated dusk-to-dawn lamp that the new customer wished to continue the dusk-to-dawn lamp service.

b. Provide copies of any records that document whether Mr. Morrison or Mrs. Morrison, individually or jointly, either agreed to the scope or type of service or requested to alter the scope or type of service Kentucky Power had been providing to the previous account holder at 440 31<sup>st</sup> Street, Ashland, Kentucky.

6. Refer to the Answer, paragraph 5(i).

a. Provide copies of the records that indicate that the account of Leodia Easterling was established as a combination electric/outdoor light account.

b. Provide copies of the records that indicate that the account of Douglas and Sylvia Morrison was established as a combination electric/outdoor light account.

7. Provide copies of all reports, work orders, service calls, and related documents pertaining to repair or service requests at 440 31<sup>st</sup> Street, Ashland, Kentucky, from December 1992 until the current date.

Case No. 2015-00136

-3-

8. State whether Mr. Morrison or Mrs. Morrison, individually or jointly, contacted Kentucky Power between April 9, 1996, and March 2015 to clarify, question or dispute charges on the monthly statement for combination electric/outdoor lighting service at 440 31<sup>st</sup> Street, Ashland, Kentucky. If such contract was made, provide copies of all records documenting the dispute, whether it was resolved, and how it was resolved.

Jeff Derouen Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

## MAY 2 7 2015

DATED

cc: Parties of Record

\*Kentucky Power Company 101 A Enterprise Drive P. O. Box 5190 Frankfort, KY 40602

\*Douglas and Sylvia Morrison 440 - 31st. St. Ashland, KENTUCKY 41101

\*Ranie Wohnhas Managing Director, Reg & Finance Kentucky Power Company 101 A Enterprise Drive P. O. Box 5190 Frankfort, KY 40602